

#### PROJECT NOTE



SDMS DocID

584909

Jard Company Inc. Hazard Ranking System Project File

John Burton, Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment

and Response Team III (START)

Thru: Mr. John F. Kelly, Project Leader, START

Date: 2 October 2013

Source, Surface Soil, and Sediment Sample Sample-Adjusted Contract Required RE:

Quantitation Limit Calculations and Form Is

Case 43395; SDG A4C22

TDD No. 13-09-0001; Task No. 0904-48; DC No. A-6873

#### Introduction

To:

From:

The following Project Note describes the sample-adjusted Contract Required Quantitation Limit (CRQL) calculations for polychlorinated biphenyls (PCBs) analytical results of two sediment samples collected from a background wetland located upgradient northeast of the site. The samples were collected by Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team III (START) for the purpose of performing a Site Reassessment in support of a U.S. Environmental Protection Agency (EPA) Hazard Ranking System (HRS)/National Priorities List (NPL) Documentation Record. The analytical data were validated at a Tier II level according to Region I EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses and the USEPA CLP National Functional Guidelines for Superfund Organic Methods.

Table 1 of this Project Note summarizes the validated analytical results for PCB analysis. Table 2 of this Project Note reports the sample-adjusted CRQL for each sample, which is either the CRQL or a raised value due to the dilution factor, percent solids, sample volume, and/or final volume. Tables 1 and 2 are included in Attachment A of this Project Note. The memorandum detailing the original validated results is included in Attachment B of this Project Note.

Copies of the pertinent Form I's have been included in Attachment C of this Project Note. CRQLs are listed in the USEPA Contract Laboratory Program Statement of Work for Organics Analysis, Multi-media Multi-concentration, SOM01.1, and the Modifications Updating SOM01.1 to SOM01.2, for PCBs, the pertinent portions of which are included in Attachment D of this Project Note.



#### Sample-adjusted CRQL Determination for Soil/Source and Sediment Samples:

The sample-adjusted CRQLs were calculated as follows: the PCB sample-adjusted CRQLs [in micrograms per kilogram ( $\mu g/Kg$ )] was calculated by multiplying the CRQL (in  $\mu g/Kg$ ) for the substance by the method extraction weight [30 grams (g) nominally], dividing this result by the dry weight extracted (in g), and multiplying this result by the dilution factor. The dry weight extracted (in g) is calculated by multiplying the percent solids, expressed as a decimal, of the sample (100% - percent moisture) by the wet weight extracted (in g) of the sample. The percent moisture, wet weight extracted, and dilution factors are reported on the Form I for the sample.

Sample-adjusted CRQL (
$$\mu$$
g/Kg) =  $[CRQL \times 30g]/\times DF$   
[%S × W<sub>W</sub>]

 $CRQL = in \mu g/Kg$  %S = Percent Solids (in decimal form)

 $W_W$  = wet weight extracted (g) DF = Dilution Factor



Attachment A

**Tables** 

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SITE: JARD COMPANY INC CASE: 43395 SDG: A4C22 LABORATORY: CHEMTECH

**CONSULTING GROUP** 

#### DATA SUMMARY TABLE 1 AROCLOR IN SOIL ANALYSIS µg/Kg

	CAMI	PLE NUMBER	A4C22	A4C23		 ı		Т
	SAMPLE LOCATION				<del></del>	 	<u></u>	
		1-	SD-51	SD-50	ļ			
		N LOCATION	JCS-559	JCS-556		 		
	LABORATO	DRY NUMBER	E1925-04	E1925-05		 		
COMPOUND	MDL	CRQL						
	1	L				 		
Aroclor-1016	1.8	33	71 U	120 U				
Aroclor-1221	5.4	33	71 U	120 U	L	 		
Aroclor-1232	0.90	33	71 U	120 U				
Aroclor-1242	4.3	33	71 U	120 U		 		
Aroclor-1248	1.9	33	71 U	120 U				
Arocior-1254	2.2	33	71 U	120 U	-			
Arocior-1260	2.2	33	71 U	120 U				•
Aroclor-1262	9.8	33	71 U	120 U				_
Aroclor-1268	4.6	33	71 U	120 U	_			
	DILUT	TION FACTOR	1.0	1.0				
	DA	TE SAMPLED	4/16/2013	4/16/2013				
DATE EXTRACTED		5/31/2013	5/31/2013					
	DATE ANALYZED		6/3/2013	6/3/2013				
	SAMPLE WE	IGHT (GRAMS)	50.0	50.1				
		% SOLID	28.0	17.0				

NOTES: μg/Kg = micrograms per Kilogram

All results are reported on a Dry Weight Basis.

CRQL = Contract Required Quantitation Limit

MDL = Method Detection Limit

U = Value is Non-Detected.

UJ = Value is Non-Detected, and Detection Limit is Estimated.

J = Value is Estimated.

R = Value is Rejected.

\* = Reported value is from diluted analysis.

ISITE: JARD COMPANY INC ICASE: 43395 SDG: A4C22 LABORATORY: CHEMTECH

CONSULTING GROUP

#### DATA SUMMARY TABLE 2 SAMPLE ADJUSTED CRQL µg/Kg

			1.1.2.1				I	<del></del>	T
		PLE NUMBER	A4C22	A4C23	J				
	SAMPLE LOCATION		SD-51	SD-59			<u> </u>		
	STATIO	N LOCATION	JCS-559	JCS-556					
	LABORATO	ORY NUMBER	E1925-04	E1925-05					
COMPOUND	MDL	CRQL.							
Aroclor-1016	1.8	33	71	120					
Aroclor-1221	5.4	33	71	120					
Aroclor-1232	0.90	33	71	120					
Arocior-1242	4.3	33	71	120					
Aroclor-1248	1.9	33	71	120					
Arocior-1254	2.2	33	71	120					
Aroclor-1260	2.2	33	71	120		•			
Aroclor-1262	9.8	33	71	120			Į .		
Aroclor-1268	4.6	33	71	120					
	DILUT	ION FACTOR	1.0	1.0					
DATE SAMPLED DATE EXTRACTED DATE ANALYZED SAMPLE WEIGHT (GRAMS)		4/16/2013	4/16/2013						
		5/31/2013	5/31/2013						
		6/3/2013	6/3/2013						
		GHT (GRAMS)	50.0	50.1					
]		% SOLID	28.0	17.0					

NOTES: μg/Kg = micrograms per Kilogram

All results are reported on a Dry Weight Basis.

CRQL = Contract Required Quantitation Limit

MDL = Method Detection Limit

U = Value is Non-Detected.

UJ = Value is Non-Detected, and Detection Limit is Estimated.

J = Value is Estimated.

R = Value is Rejected.

\* = Reported value is from diluted analysis.



#### Attachment B

Data Validation Memorandum Case No. 43395; SDG No. A4C22

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Weston Solutions, Inc. East Division 3 Riverside Drive Andover, Massachusetts 01810 978-552-2100 - Fax 978-658-0700

SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM EPA CONTRACT EP-W-05-042

21 August 2013 20114-091-998-0850-49 DC No. A-6861

Ms. Martha Bosworth
U.S. EPA Region I - New England
Emergency Planning & Response Branch
5 Post Office Square, Suite 100
Mail Code OSRR07-2
Boston, Massachusetts 02109-3912

Subject: Case No. 43395; SDG No. A4C22

ChemTech Consulting Group (Chem)

Jard Company Inc Bennington, Vermont

AROCLOR: 2/Soil/A4C22, A4C23

(Field Duplicates A4C26/A4C30)

5/Aqueous Equipment Blanks/A4C19, A4B13, A4B14, A4B16,

A4B54

4/Soil PEs/A4C20, A4C21, A4C31, A4C32

**CERCLIS No. VTD048141741** 

TDD No. 12-10-0008, Task No. 0850-49

#### Dear Ms. Bosworth:

A Tier II validation was performed on the organic analytical data for two soil samples and five aqueous equipment (rinsate) blanks collected by WESTON START at the Jard Company Inc site in Bennington, Vermont, and for four PE samples obtained from EPA Region I. *Italicized sample ID numbers in the list above are associated with samples in this SDG, but reported in another SDG.* The samples were re-analyzed under CLP following SOW SOM01.2 as low/medium level for Aroclor compounds, per direction of the Region. The data were evaluated as Tier II level in accordance with the "Region I EPA-NE Data Validation Functional Guidelines for Evaluating Environmental Analyses" dated December 1996, and the USEPA CLP National Functional Guidelines for Superfund Organic Methods, and were based on the following parameters:

- Overall Evaluation of Data and Potential Usability Issues.
- Data Completeness.
- Preservation and Technical Holding Times.
- GC/MS and GC/ECD Instrument Performance Checks.
- \* IC and CC.
- Blanks.
- \* Surrogate Compounds.
- NA IS.
- \* MS/MSD.
- \* Field Duplicates.

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Sensitivity Check (MDL Study or LFB).

PE Samples/Accuracy Check.

Target Compound Identification.

Sample Quantitation and Reported Quantitation Limits.

NA

SVOC and PEST/PCB Cleanup.

System Performance.

SEDD/ADR. NA

No qualifications will be applied based on this parameter.

Table I summarizes overall evaluation of the data with reference to the DQO and potential usability issues. Qualified data are summarized in Data Summary Tables 1 and 2.

#### Overall Evaluation of Data and Potential Usability Issues

See Table I for overall evaluation of data and potential usability issues.

#### PE Samples/Accuracy Check

The criteria used by START for qualification of sample data based on the PE sample results are as follows:

	Action			
PE Score	Non-Detects	Positive Results		
In Window	Accept	Accept		
Warning Low/High	Accept	Accept		
Action Low	Reject (R)	Estimate (J)		
Action High	Accept	Estimate (J)		
TCL Misses	Reject (R)	Varies		
TCL Contaminants	Accept	Varies		
TIC Misses	Varies	Varies		
TIC Contaminants	Varies	Varies		

All non-compliant PE scores were investigated by checking raw data, calculations, calibrations, possible matrix interferences, and blank contamination. Unless otherwise noted, all results reported by the laboratory were found to be correct, based on the data generated by the laboratory.

The laboratory properly identified and quantified the soil Aroclor-1242 PE sample (A4C31, PE No. ASX0179). No qualifications were applied.

Case 43395; SDG A4C22

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The laboratory properly identified and quantified the soil Aroclor-1242 PE sample (A4C20, PE No. ASX0182). No qualifications were applied.

The laboratory properly identified and quantified the soil Aroclor-1254 PE sample (A4C21, PE No. AS1486). No qualifications were applied.

The laboratory properly identified and quantified the soil Aroclor-1248 PE sample (A4C32, PE No. AS1431). No qualifications were applied.

#### Sample Quantitation and Reported Quantitation Limits

The percent moisture for sediment samples A4C22 and A4C23 was greater than 70% but less than 90%. The SOW indicates in Exhibit D, Aroclors, Section 10.1.4.3.2, that if a sample contains greater than 65% moisture, the laboratory may use up to 50 grams without contacting the Sample Management Office (SMO). Per direction of the Region, these two samples were re-extracted, reanalyzed, and validated in this SDG. A 50-gram extraction weight was used. These samples were originally validated in SDG A4C19.

Ms. Martha Bosworth 21 August 2013 Page 4

Please contact the undersigned at (978) 552-2100 if you have any questions or need further information.

Very truly yours,

WESTON SOLUTIONS, INC. Region I START

William W. Mahany Principal Project Scientist

John Burton Lead Chemist

email cc:

Jennifer Feranda (CLP PO - Region II) - DV Letter w/Data Tables, and ORDA Form only -

Feranda.jennifer@epa.gov

Attachments:

Table I: Overall Evaluation of Soil Data

Data Summary Key Acronym List Data Summary Table 1 DV Worksheets

PE Sample Score Reports (included in DV worksheets)

Field Sampling Notes (including a copy of sampler's COC Records)

CSF Audit (DC-2 Form) - Evidence Audit Photocopy (Including CSF Receipt/Transfer Form)

**DQO Summary Form** 

S:\12100008\Analytical\Case\_43395\A4C22\A4C22\_val\_.doc

HRS Reference #85

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#### TABLE I

#### JARD COMPANY INC Case No. 43395; SDG No. A4C22

#### **Overall Evaluation of Soil Data**

AROCLORs						
DQO (list all DQOs)	Sampling and/or			Sampling		
	Analytical Method Appropriate Yes or No	Analytical Error	Sampling Error*	Variability**	Potential Usability Issues	
1. To obtain sufficient data from surface and subsurface soil samples collected at the Jard Company site for PCB (Aroclor) analysis, to document potential source areas located on and off the property, and to document contamination in the soil and sediment associated with source areas located on the property.	Yes, SOM01.2  Sampling Method: Yes, Hand Augers, and Stainless Steel Scoops.	Refer to qualifications in attached Data Summary Table 1.	Refer to qualifications in attached Data Summary Table 1.		None.	

- The evaluation of "sampling error" cannot be completely assessed in data validation.
- Sampling variability is not assessed in data validation.

## DATA SUMMARY KEY ORGANIC DATA VALIDATION

J The associated numerical value is an estimated quantity. R The data are unusable (compound may or may not be present). Resampling and reanalysis are necessary for verification. The R replaces the numerical value or SQL. The compound was analyzed for, but not detected. The associated numerical U value is the SQL or the adjusted SQL. The compound was analyzed for, but not detected. The associated numerical UJ value is the estimated SQL. The compound was identified in an aqueous EB that was used to assess field EB contamination associated with soil/sediment samples. TB The compound was identified in an aqueous TB that was used to assess field contamination associated with soil/sediment samples. BB The compound was identified in an aqueous BB that was used to assess field == contamination associated with soil/sediment samples.

# ACRONYM LIST ORGANIC DATA VALIDATION

AQ	aqueous	S
AQ FB	aqueous field blank	
BB	Bottle Blank	S
B/N	base/neutral compound	S
°C	degrees Celsius	
CC	<del>-</del>	c
	Continuing Calibration	S
CCV	Continuing Calibration	2.
	Verification	T T
CLP	Contract Laboratory Program	T
COC	Chain-of-Custody record	Ī
COR	Contracting Officer Representative	Т
CRQL	Contract Required Quantitation	Т
•	Limit	7
CSF	Complete SDG File	7
%D	percent difference	•
DAS	Delivery of Analytical Services	
DMC	Deuterated Monitoring Compound	•
DQO	Data Quality Objective	
DV	Data Validation	
DW	drinking water	
EB	Equipment Blank	
EPA	Environmental Protection Agency	
GC/ECD	Gas Chromatograph/Electron	
	Capture Detector	
GC/MS	Gas Chromatograph/Mass	
	Spectrometry	
GW	groundwater	
IC	Initial Calibration	
IS	Internal Standard	
kg	kilogram	
L L	liter ·	
LCS	Laboratory Control Sample	
LFB	Laboratory Fortified Blank	
MDL	Method Detection Limit	
μg	microgram	
MS	Matrix Spike	
MSD	Matrix Spike Duplicate	
NA	Not Applicable	
ND	non-detected result	
ng	nanogram	
NERL	New England Regional Laboratory	
OSC	On-Scene Coordinator	
ORDA	Organic Regional Data	
,	Assessment	
PAH	polynuclear aromatic hydrocarbon	
PCB	polychlorinated biphenyl	
ICB		
DECEMAND.	compound	
PEST/PCB	pesticide/polychlorinated biphenyl	
	compound	
PE	Performance Evaluation	
- Pos	positive result	
QC	Quality Control	
%R	percent recovery	
RPD	Relative Percent Difference	
RRF	Relative Response Factor	•
RSD	Relative Standard Deviation	
SDG	Sample Delivery Group	
SOW HRS Reference #85	Partition of Warning .	

SQL	Sample Quantitation Limit
S/S	soil/sediment
S/S (m)	soil/sediment medium level
START	Superfund Technical Assessment
	and Response Team
SVOC	semivolatile organic compound
.SW	surface water
TB	Trip Blank
TCL	Target Compound List
TDD	Technical Direction Document
TIC.	Tentatively Identified Compound
TR	Traffic Report
VOC	volatile organic compound
WESTON	Weston Solutions, Inc.

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SITE: JARD COMPANY INC CASE: 43395 SDG: A4C22 LABORATORY: CHEMTECH

**CONSULTING GROUP** 

#### DATA SUMMARY TABLE 1 AROCLOR IN SOIL ANALYSIS µg/Kg

<b>学上通过</b> 证	, 📜 🔡 SAM	PLE NUMBER	A4C22 SD-51 SD-51 CS-559 E1925-04	A4C23	主工工學基數也	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		* . * * * * * * * * * * * * * * * * * *	
	SAMPI	E LOCATION	- * : id=福全SD-51. 語:	記しては <b>直SD-50</b> ビデ		Big harden.		业的基础 (高级)	
	STATIC	N LOCATION	N: 10 S 559 €	単版でUCS-556。単				柳本属的點點中級問題	
	LABORATO	ORY NUMBER	」上記E1925-04、∞皇	£. E1925-05 * =	Er Marin				・ここを謂うい物論
COMPOUND 🚓	€ <u>€</u> MDC±itz	, CRQL		er r <del>eli</del> sion.	表在7.1.20 <b>20年</b> 1.100	医髓体 医牙囊结	CONTRACTOR OF THE CONTRACTOR O		. 其程之,不错
Arocior-1016	1.8	33	71 U	120 U					
Aroclor-1221	5.4	33	71 U	120 U					
Aroclor-1232	0.90	33	71 U	120 U					
Aroclor-1242	4.3	33	71 U	120 U				· ·	
Aroclor-1248	1.9	33	71 U	120 U					
Aroclor-1254	2.2	33	71 U	120 U					
Aroctor-1260	2.2	33	71 U	120 U		ı			
Arocior-1262	9.8	33	71 U	. 120 U					
Aroclor-1268	4.6	33	71 U	120 U					
CATAL TO	KANTA LAND								
	DILUT	ION FACTOR	1.0	1.0					
	P DA	TE SAMPLED	4/16/2013	4/16/2013				ĺ	
	DATE	EXTRACTED	5/31/2013	5/31/2013					
	DAT	E ANALYZED	6/3/2013	6/3/2013					,
	SAMPLE WE	GHT (GRAMS)	50.0	50.1					
		% SOLID	28.0	17.0					

NOTES: µg/Kg = micrograms per Kilogram

All results are reported on a Dry Weight Basis. CRQL = Contract Required Quantitation Limit

MDL = Method Detection Limit

U = Value is Non-Detected.

UJ = Value is Non-Detected, and Detection Limit is Estimated.

J = Value is Estimated.

R = Value is Rejected.

\* = Reported value is from diluted analysis.

#### REGION I, EPA-NE ORGANIC REGIONAL DATA ASSESSMENT (ORDA)\*

Case No.: <u> </u>		Site Name:	Jard (	Company -	In
SDG No.: 44 ( ) >		No. of Sample	es/Mat <u>rix:</u>	2/580	
Lab Name: Chemtech		Validation Co	ntractc <u>WES</u>	TON ·	
SOW#/Contract#: SOM01.2		Validator's Na	ame: Ma	ahany	
EPA-NE DV Tier Level:Tier II		Date DP Rec			
TPO/PO: **ACTION FYI		DV Completic	on Date:	7/16/13	
ANALYTICAL DATA Q	UALITY SU	MMARY	•		
<ol> <li>Preservation and Contractual Holding Times:</li> <li>GC/MS / GC/ECD Instrument Performance Check:</li> <li>Initial Calibration:</li> <li>Continuing Calibration:</li> <li>Blanks:</li> <li>DMCs or Surrogate Compounds:</li> <li>Internal Standards:</li> <li>Matrix Spike/Matrix Spike Duplicate:</li> <li>Sensitivity Check:</li> <li>PE samples - Accuracy Check:</li> <li>Target Compound Identification:</li> <li>Compound Quantitation and Reported QLs:</li> <li>Tentatively Identified Compounds:</li> <li>Semivolatile Cleanup/Pesticide/PCB Cleanup:</li> <li>Data Completeness:</li> <li>Overall Evaluation of Data.</li> <li>Data were qualified due to major contractual problem:</li> <li>Data were rejected as unusable due to major contractual problem:</li> <li>Data were rejected as unusable due to major contractual problem:</li> </ol> Action Items (z items): Comments:	ns.	•		A NA	
*This form appacase the analytical data quality is items of	of contractue	il compliance o	nhu Italaan	not nonnon name	—
*This form assesses the analytical data quality in items of errors and/or non-contractual analytical issues that affections and the contractual analytical issues that affect the contractual analytical data quality in items of the contractual data quality in items of the contractual analytical data quality in items of the contractual data quality in items o	t data quality	i compilance o /.	my. It does i	not assess samp	ıнıg
** Check "ACTION" only if contractual defects resulted i	in reduced p	ayment/data re	ejection recor	mmendations.	
Validator: Mahany	D	ate:7	<u>X 13</u>		
·		<u>C</u>	<sub>フ</sub>		

EPA - NE

Data Validation Worksheet Cover Page 7 Page 1

Site Name: Sind Company In C
TDD No.: 12-10-408
Task No.: 0850

REGION I ORGANIC DA	TA VALIDATION	•
The following data package has been validated:		
Lab Name: Chenn tech Consulting GRP.	SOW #/Contract #:	COMM A
·		SOM01.2
Case No.: <u> </u>	· Sampling Dates:	4/16//3
SDG No.: AY ( 7 2	Shipping Dates:	4/18/13
No. of Samples/Matrix:	Date Rec'd by Lab:	4/19/13
Traffic Report Sample Nos: AY( レ )、	- 3	· ·
Trip Blank No.:		
Equipment Blank No:		· · · · · · · · · · · · · · · · · · ·
Field Duplicate Nos:	···	
PE Nos:	· · · · · · · · · · · · · · · · · · ·	·
A Tier II or a Tier III evaluation was used to validate the data was used, then identify samples, parameters, etc. that receiv	ed partial Tier III valldation:	artial Tier III
The data were evaluated based upon the following paramete	rs:	
- Overall Evaluation of Data	- Field Duplicates	
- Data Completeness (CSF Audit - Tier I) - Preservation and Technical Holding Times	<ul> <li>Sensitivity Check</li> <li>PE Samples/Accura</li> </ul>	ov Chack
- GC/MS and GC/ECD Instrument Performance Check	- Target Compound k	
- Initial and Continuing Calibrations	- Compound Quantita	
- Blanks	Quantitation Limits	
- Surrogate Compounds - Internal Standards	-TICs -Semivolatile and Pes	sticide/PCR Cleanus
- Matrix Spike/Matrix Spike Duplicate	- System Performance	•
Region I Definitions and Qualfiers:		
A - Acceptable Data		
J - Numerical value associated with compound is an estimate	ed quantity.	·
R - The data are rejected as unusable. The R replaces the n U - Compound not detected at that numerical sample quantit		ntitation limit.
UJ - The sample quantitation limit is an estimated quantity.	auon anni.	•
TB, EB - Compound detected in aqueous trip blank or aqueo	us equipment blank associate	d with soil/sediment samples.
Validator's Name: ΛΛΙΜΑΥ΄ Cor	npany Name: <u>WESTON</u>	Phone Number: <u>978-552-21</u> 00
Date Validation Started: 7/9/13	Date Validation Completed:	7/10/13
•		

#### EPA - NE Data Validation Worksheet Cover Page - Page 2

Check if all criteria are met and no hard copy worksheet provided. Indicate NA if worksheet is not applicable to analytical method. Note: There is no standard worksheet for System Performance, however, the validator must document all system performance issues in the Data Validation Memorandum.

#### VOA/SV Worksheets:

VOA/SV-Pest/PCB	COMPLETE SDG FILE (CSF) AUDIT	NA
VOA/SV-Pest/PCB-I	PRESERVATION AND HOLDING TIMES	@ !
VOA/SV-II	GC/MS INSTRUMENT PERFORMANCE CHECK (TUNING)	
VOA/SV-III	INITIAL CALIBRATION	
VOA/SV-IV	CONTINUING CALIBRATION	
VOA/SV-Pest/PCB-V-A	BLANK ANALYSIS	
VOA/SV-Pest/PCB-V-B	BLANK ANALYSIS	
VOA-VI	VOA SURROGATE SPIKE RECOVERIES	
SV-VI	SV SURROGATE SPIKE RECOVERIES	
VOA/SV-VII	INTERNAL STANDARD PERFORMANCE	
VOA/SV-Pest/PCB-VIII	MATRIX SPIKE/MATRIX SPIKE DUPLICATE	
VOA/SV-Pest/PCB-IX	FIELD DUPLICATE PRECISION	
VOA/SV-Pest/PCB-X	SENSITIVITY CHECK	NA NA
VOA/SV-Pest/PCB-XI	ACCURACY CHECK/ PE SCORE SHEETS	@
VOA/SV-Pest/PCB-XII	TARGET COMPOUND IDENTIFICATION	NA NA
VOA/SV-Pest/PCB-XIII	SAMPLE QUANTITATION	
VOA/SV-XIV	TENTATIVELY IDENTIFIED COMPOUNDS	
VOA/SV-XV	SEMIVOLATILE CLEANUP	<del> ∀</del> /
TABLE II - WORKSHEET	OVERALL EVALUATION OF DATA	<del></del>
• 	•	
O Worksheets:	•	

#### Pest/ARO

VOA/SV-Pest/PCB	COMPLETE SDG FILE (CSF) AUDIT	/
VOA/SV-Pest/PCB-1	PRESERVATION AND HOLDING TIMES	@
Pest/PCB-IIA	GC/ECD INSTRUMENT PERFORMANCE CHECK-	
	RESOLUTION	./
Pest/PCB-IIB	GC/ECD INSTRUMENT PERFORMANCE CHECK-	.——
	RETENTION TIMES	_
Pest/PCB-IIC	GC/ECD INSTRUMENT PERFORMANCE CHECK-	
	ACCURACY CHECK OF INITIAL CALIBRATION	
Pest/PCB-IID	GC/ECD INSTRUMENT PERFORMANCE CHECK-	
	PESTICIDE DEGRADATION	. /
Pest/PCB-III	INITIAL CALIBRATION	
Pest/PCB-IV	CONTINUING CALIBRATION	
VOA/SV-Pest/PCB-V-A	BLANK ANALYSIS	<del></del>
VOA/SV-Pest/PCB-V-B	BLANK ANALYSIS	
Pest/PCB-VI	SURROGATE COMPOUNDS: SPIKE RECOVERIES	
	AND RETENTION TIME SHIFT	
Pest/PCB-VII	PESTICIDE CLEANUP	
VOA/SV-Pest/PCB-VIII	MATRIX SPIKE/MATRIX SPIKE DUPLICATE	·
VOA/SV-Pest/PCB-IX	FIELD DUPLICATE PRECISION	<del>- \</del>
VOA/SV-Pest/PCB-X	SENSITIVITY CHECK	NA NA
VOA/SV-Pest/PCB-XI	ACCURACY CHECK/ PE SCORE SHEETS	<u> </u>
Pest/PCB-XII	COMPOUND IDENTIFICATION	<del></del>
VOA/SV-Pest/PCB-XIII	SAMPLE QUANTITATION	int
TABLE II - WORKSHEET	OVERALL EVALUATION OF DATA	1.61
· · · · · · · · · · · · · · · · · · ·		

I certify that all criteria were met for the worksheets checked a	above.		@ - always included * - See DV Memo
Signature:	Name:	Bill	Mahany
Date: 7/9//3	•		7

Page 17 of 72

EPA-NE - Data Validation Worksheet .VOA/SV - Pest/ARO - 2

1. PRESERVATION AND HOLDING TIMES

Documented.
Page:

Sampler: HarNoK

- Cooler ره Temp:

Page 1	Preservation Code:  1. Cool @ 4°C (± 2°C)  2. Preserve with HCl to ≤ pH 2.  3. Protect from light.  4. Freeze.  5. Room temperature (avoid excessive heat).  6. Encore sampler (48 hour hold time)

Validator. Mahany

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Sample No.		Pres.	. Date	Date	from Samp.	*Ext.	Date	from Ext.		Date	from Samp.	*Ext.	Date	from Ext.	
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EF VC	PA - NE - Data Validation Worksheet DA/SV - Pest/PCB -XI
XI.	ACCURACY CHECK (Performanc
.***	SDG No.: AYCYY

Re-run, PE RASED
in mitible run/505

Performance Evaluation Results) - List all analytes that are outside criteria.

Case: 4 3 3 9 5

. Are more than one-half the PE analytes within criteria for each parameter?  $\frac{1}{2}$ 

No

Always submit this sheet and attach PE score sheets

PE Sample No.	Ampule No.	Parameter	Type of PE	Matrix	Analyte	Conc.	Region I EPA PE Scores*	Samples Affected	Action
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<sup>\*</sup>For Region I PE indicate the Region I PE Score report result: Action High, Acion Low, TCL Miss, or TCL Contaminant.

Validator:	Mahan		Date:	7/10/	1/3.	
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PES ASX0182 Rev: 1 EPA Sample No.: A4C20 Report Date: 05/13/2013 Page 1 of 1

Lab Name: Chemtech Consulting Group

Lab Code: CHEM Contract: EPW11030 Case No.: 43395 SAS/Client No.: NA SDG No.: A4C19 Matrix: Soil Lab Sample ID: E1925-02 Lab File ID: PO008786,D Date Received: 04/19/2013 Date Extracted: 04/23/2013

Date Analyzed: 04/25/2013 Sample Wt./Vol. (g/mL): 30.0 g % Moisture: 0.0 Decanted No Extraction Type: SOXH Conc. Extract Vol. (uL): 10000 Injection Vol. (uL): 1.0

GPC Cleanup: No pH: NA Sulfur Cleanup: No Dilution Factor: 1.0 Units: ug/Kg

Analysis Method: SOM01.2 Scoring Method: SOM01.2

Comments:

CAS No.	Analyte	Laboratory	Results	PES Evaluation		
		Concentration	Q			
53469-21-9	Aroclor-1242	. 710	D.	PASS	Within Limits	
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**PES AS1486** Rev: 1 EPA Sample No.: A4C21 Report Date: 05/13/2013 Page 1 of 1

Lab Name: Chemtech Consulting Group

Lab Code: CHEM Contract: EPW11030 SAS/Client No.: NA Case No.: 43395 SDG No.: A4C19 Matrix: Soil Lab Sample ID: E1925-03 Lab File ID. PO008787.D Date Received: 04/19/2013 Date Extracted: 04/23/2013 % Moisture: 0.0

Date Analyzed: 04/25/2013 Sample Wt./Vol. (g/mL): 30 0 g Decanted No Extraction Type: SOXH

Conc. Extract Vol. (uL): 10000 Injection Vol. (uL): 1.0 GPC Cleanup: No pH· NA Sulfur Cleanup: No Dilution Factor: 1.0 Units. ug/Kg

Analysis Method: SOM01.2 Scoring Method: SOM01.2

Comments:

CAS No.	Analyte	Laboratory	Results	PES Evaluation		
		Concentration	Q .	i :		
11097-69-1	Aroclor-1254	950	D	PASS	Within Limits	
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PES ASX0179

Rev: 1

EPA Sample No.: A4C31

Report Date: 05/21/2013

Page 1 of 1

Lab Name: Chemtech Consulting Group

Contract: EPW11030

Case No.: 43395

Lab Code: CHEM SAS/Client No.: NA

SDG No.: A4C19

Matrix: Soil Date Received: 04/19/2013 Lab Sample ID: E1925-15 Date Extracted: 04/23/2013

Lab File ID: PO008799.D Date Analyzed: 04/25/2013

Sample Wt./Vol. (g/mL): 30.0 g

% Moisture: 0.0

. Decanted: No

Extraction Type: SOXH

Conc. Extract Vol. (uL): 10000

Injection Vol. (uL): 1.0

GPC Cleanup: No

Sulfur Cleanup: No

Dilution Factor: 1.0

pH: NA Units: ug/Kg

Analysis Method: SOM01 2 Scoring Method: SOM01.2

Comments:

CAS No.	Analyte	Laboratory	Results	PES Evaluation		
		Concentration	. Q			
53469-21-9	Aroclor-1242	900	D	PASS	Within Limits	
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PES AS1431

Rev: 1

EPA Sample No.: A4C32

Report Date: 05/21/2013

Page 1 of 1

Lab Name: Chemtech Consulting Group

Contract: EPW11030

Case No.: 43395 Matrix: Soil

Lab Code: CHEM SAS/Client No.: NA

SDG No.: A4C19 Lab File ID: PO008805.D

Date Received: 04/19/2013

Lab Sample ID. E1925-16 Date Extracted: 04/23/2013

Date Analyzed: 04/25/2013

Sample Wt./Vol. (g/mL): 30.0 g

% Moisture: 0.0

Decanted: No Injection Vol. (uL): 1.0 Extraction Type: SOXH

Conc. Extract Vol. (uL): 10000

GPC Cleanup: No

pH: NA

Sulfur Cleanup: No

Dilution Factor: 1.0

Units: ug/Kg

Analysis Method: SOM01.2 Scoring Method: SOM01.2

Comments:

CAS No.	Analyte	Laboratory	Results	PES Evaluation		
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12672-29-6	Aroclor-1248	. 370		PASS	Within Limits	
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EPA - NE - Data Validation Worksheet VOA/SV - Pest/PCB - XIII

#### XIII. SAMPLE QUANTITATION

If no PE, do sample calculation.

Recalculate, from the raw data, the concentration for one positive detect and one reported sample quantitation limit (SQL) for a non-detect in a diluted sample or soil sample per fraction. (Note: Although Section XIII, C 2. a. requires that one calculation for each fraction in each sample be performed, the validator is only required to reproduce an example, for each fraction, of one positive detect and one SQL calculation on this worksheet.)

Fraction		Calcu	lation*
VOC	D	Detect:	Non-detect QL:
Sample No.:			
Reported Compound:			
Reported Value:			
Non-detected Compound:			,
Reported Quantitation Limit:			
svoc	l <sub>o</sub>	Detect:	Non-detect QL;
Sample No.			
Reported Compound:			
Reported Value:			·
Non-detected Compound:			
Reported Quantitation Limit:			
P/PCB	۵	Detect:	Non-detect QL:
Sample No.:	A4C>>		
Reported Compound:			33 ms/ks \$04 30
Reported Value.	NA		1
Non-detected Compound:	ALL		3 3 ms/ks. 305.38 - 71 U
Reported Quantitation Limit.	71 0		$oldsymbol{\mathcal{O}}$

Do all soil/sediment samples have % solids greater than 30%? Y N	If solids <30%, have sample volumes been increased sufficiently to compensate? Y
If no. list sample numbers	

TDD No. 01-12-10-0008 Logbook No. 01433-S Site Reassessment

- 1520 hrs: Surface soil sample P001-SS-08A (Sample #: JCS-501) was collected with a metal scoop at a depth of 0 to 6 inches bgs from residential property P001 at surface soil sample location P001-SS-08, located on the southern bank of the stream, 50 feet east of P001-SS-07, and later submitted for PCB field screening analysis.
- 1530 hrs: Surface soil sample P001-SS-01A (Sample #: JCS-481) was collected with a metal scoop at a depth of 0 to 6 inches bgs from residential property P001 at surface soil sample location P001-SS-01, located directly adjacent to the residence beneath the former location of a recently demolished deck, and later submitted for PCB field screening analysis:
- 1535 hrs: Surface soil sample P001-SS-08B (Sample #: JCS-502) was collected with a hand auger at a depth of 6 to 10 inches bgs from surface soil sample location P001-SS-08 (see above) and later submitted for PCB field screening analysis. No 'C' interval was collected for surface soil sample location P001-SS-08 due to refusal.
- 1540 hrs: Surface soil sample P001-SS-01B (Sample #: JCS-482) was collected with a hand auger at a depth of 6 to 12 inches bgs from surface soil sample location P001-SS-01 (see above) and later submitted for PCB field screening analysis.
- 1550 hrs: Surface soil sample P001-SS-01C (Sample #: JCS-483) was collected with a hand auger at a depth of 12 to 24 inches bgs from surface soil sample location P001-SS-01 (see above) and later submitted for PCB field screening analysis.
- 1600 hrs: START Team Members reviewed and turned in completed surface soil data sheets for each sample location.
   Sample aliquots for PCB field screening, collected to date, were transferred to EPA chemist Clifford for processing and PCB field screening analyses.
- 1630 hrs: START personnel secured IDW drums, secured the site and departed the Jard property.

### Weather: Partly cloudy, Signature 16 April 2013 (Tuesday) – Sediment Sampling

- 0730 hrs: START members Kelly, Hornok, Bitzas, Dupree, Robinson, Saylor, Christine Scesny, and Sharp arrived at the Jard property.
- 0745 hrs: START HSC Kelly reviewed the site HASP and conducted a tailgate health and safety meeting for all on-site START personnel, including reviews of the physical hazards (uneven terrain; trips-slips-falls, working near water, heavy lifting, traffic concerns, potential adverse weather conditions), chemical hazards (PCBs), Radiation (Not encountered previously but will be monitored) and biological hazards (ticks, poison ivy, thorn bushes, snakes, dogs, animals). Personnel reviewed and signed the HASP documentation, as needed. START members completed calibration checks on air monitoring instrument; MultiRAE Plus, LEL, O2, H2S, CO, and PID meter. Background ambient readings: LEL = 0%; O2 = 20.9%; H2S = 0 ppm; CO = 0 ppm; and VOC = 0 ppm.
  - START Team established decontamination area and conduct decontamination of non-
- sample SD-50A (Sample #: JCS-556) was collected using a metal scoop at a depth of 0 to 6 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0850 hrs: Sediment sample SD-50B (Sample #: JCS-557) was collected using a hand auger at a depth of 6 to 12 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0855 hrs: Sediment sample SD-50C (Sample #: JCS-558) was collected using a hand auger at a depth of 12 dedicated equipment. Non-dedicated equipment (augers, metal scoops, etc.) will be

Page 52 of 68

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#### DRAFT Log Book Notes

TDD No. 01-12-10-0008 Logbook No. 01433-S Site Reassessment

- decontaminated after the collection of each sample, and prior to use for the collection of other samples.
- 0830 hrs: START members Bitzas and Hornok began documenting previously mapped/delineated wetland area located west of Park Street. In addition, START members Kelly and Sharp began marking sediment sample locations, first in the background wetland located north of the Jard property and then in the area west of Park Street. Additional START personnel mobilized to the background wetland located north of the Jard property to begin sampling.
- 0845 hrs: Sediment to 24 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0930 hrs: Sediment sample SD-51A (Sample #: JCS-559) was collected using a metal scoop at a depth of 0 to 6 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0940 hrs: Sediment sample SD-51B (Sample #: JCS-560) was collected using a hand auger at a depth of 6 to 12 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0945 hrs: Sediment sample SD-51C (Sample #: JCS-561) was collected using a hand auger at a depth of 12 to 24 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0950 hrs: Sediment sample SD-52A (Sample #: JCS-562) was collected using a metal scoop at a depth of 0 to 6 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 0955 hrs: Sediment sample SD-52B (Sample #: JCS-563) was collected using a hand auger at a depth of 6 to 12 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1000 hrs: Sediment sample SD-52C (MS/MSD) (Sample #: JCS-564) was collected using a hand auger at a depth of 12 to 24 inches bgs from a background wetland (PEM) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1020 hrs: Sediment sample SD-53A (Sample #: JCS-565) was collected using a metal scoop at a depth of 0 to 6 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1025 hrs: Sediment sample SD-53B (Sample #: JCS-566) was collected using a hand auger at a depth of 6 to 12 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1030 hrs: Sediment sample SD-53C (Sample #: JCS-567) was collected using a hand auger at a depth of 12 to 24 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1100 hrs: Sediment sample SD-54A (Sample #: JCS-568) was collected using a metal scoop at a depth
- 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1735 hrs: Sediment sample SD-18B (Sample #: JCS-509) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1800 hrs: START Team Members reviewed and turned in completed sediment sample data sheets for each sample location. Note that samples were generally collected in sequence from downstream to upstream locations. However, due to the limited water flow and direct flow path between sample locations, there does not appear to be any potential cross-contamination influence as a of 0 to 6 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.

Jard Company, Inc.
Bennington, Vermont
CERCLIS No. VTD048141741

- 1105 hrs: Sediment sample SD-54B (Sample #: JCS-569) was collected using a hand auger at a depth of 6 to 12 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1110 hrs: Sediment sample SD-54C (Sample #: JCS-570) was collected using a hand auger at a depth of 12 to 24 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1125 hrs: Sediment sample SD-55A (Sample #: JCS-571) was collected using a metal scoop at a depth of 0 to 6 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1130 hrs: Sediment sample SD-55B (Sample #: JCS-572) was collected using a hand auger at a depth of 6 to 12 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1135 hrs: Sediment sample SD-55C (Sample #: JCS-573) was collected using a hand auger at a depth of 12 to 24 inches bgs from a background wetland (PSS) area located north of the Jard property and later submitted for PCB field screening analysis.
- 1315 hrs: Sediment sample SD-48A (Sample #: JCS-553) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from an area directly adjacent to the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis. Note that samples are being collected from downstream to upstream locations. However, due to the limited water and flow, there does not appear to be any potential cross-contamination influence as a result of stirring up the sediment at adjacent sampling locations.
- 1320 hrs: Sediment sample SD-48B (Sample #: JCS-554) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from an area directly adjacent to the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.

  In addition, sediment sample SD-49A (Sample #: JCS-555) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.
- 1325 hrs: Sediment sample SD-47A (Sample #: JCS-551) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis..
- 1330 hrs: Sediment sample SD-46A (Sample #: JCS-550) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.
- 1335 hrs: Sediment sample SD-45A (Sample #: JCS-549) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.
  - In addition, sediment sample SD-47B (Sample #: JCS-552) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.
- 1340 hrs: Sediment sample SD-43A (Sample #: JCS-547) was collected using a metal scoop at a depth of 0 to 6 inches below the sediment-water interface from the unnamed stream located west of

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DRAFT Log Book Notes

Jard Company, İnc.
Bennington, Vermont
CERCLIS No. VTD048141741

TDD No. 01-12-10-0008 Logbook No. 01433-S Site Reassessment

the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.

In addition, sediment sample SD-44A (Sample #: JCS-548) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the unnamed stream located west of the Jard property and which drains the wetland area on property P030. The sample was later submitted for PCB field screening analysis.

- 1344 hrs: Sediment sample SD-42A (Sample #: JCS-545) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1349 hrs: Sediment sample SD-42B (Sample #: JCS-546) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1350 hrs: Sediment sample SD-41A (Sample #: JCS-544) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1355 hrs: Sediment sample SD-40A (Sample #: JCS-543) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1405 hrs: Sediment sample SD-39A (Sample #: JCS-542) was collected using a hand auger at a depth of 0 to 8 inches below the sediment-water interface from the stream that runs behind property P041 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1445 hrs: Sediment sample SD-38A (Sample #: JCS-541) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the stream that runs through residential property P005 located west of the Jard property on Park Street. The sample was later submitted for PCB field screening analysis.
- 1448 hrs: Sediment sample SD-36A (Sample #: JCS-538) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the stream that runs through residential property P006 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1450 hrs: Sediment sample SD-37A (Sample #: JCS-540) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the stream that runs through residential property P005 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1452 hrs: Sediment sample SD-36B (Sample #: JCS-539) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the stream that runs through residential property P006 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1455 hrs: Sediment sample SD-35A (Sample #: JCS-537) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the stream that runs through property P032 and Duck Pond located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis. Weather conditions change from light to heavy rain.
- 1500 hrs: Sediment sample SD-34A (Sample #: JCS-536) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the stream that runs through property

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Jard Company, Inc.
Bennington, Vermont
CERCLIS No. VTD048141741

- P032 and Duck Pond located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1505 hrs: Sediment sample SD-32A (Sample #: JCS-534) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the pond that exists on residential property P011 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.

  In addition, sediment sample SD-33A (Sample #: JCS-535) was collected using a hand auger
  - at a depth of 0 to 12 inches below the sediment-water interface from the stream that runs through property P031 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1510 hrs: Sediment sample SD-31A (Sample #: JCS-532) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the pond that exists on residential property P011 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1513 hrs: Sediment sample SD-31B (Sample #: JCS-533) was collected using a hand auger at a depth of 12 to 18 inches below the sediment-water interface from the pond that exists on residential property P011 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1515 hrs: Sediment sample SD-30A (Sample #: JCS-530) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the pond that exists on residential property P011 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1520 hrs: Sediment sample SD-30B (Sample #: JCS-531) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the pond that exists on residential property P011 located west of the Jard property along Park Street. The sample was later submitted for PCB field screening analysis.
- 1540 hrs: Sediment sample SD-19A (Sample #: JCS-510) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
  - In addition, sediment sample SD-20A (Sample #: JCS-512) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1542 hrs: Sediment sample SD-19B (Sample #: JCS-511) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1545 hrs: Sediment sample SD-20B (Sample #: JCS-513) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
  - In addition, sediment sample SD-25A (Sample #: JCS-520) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1550 hrs: Sediment sample SD-25B (Sample #: JCS-521) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the

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Jard Company, Inc.
Bennington, Vermont
CERCLIS No. VTD048141741

- Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1555 hrs: Sediment sample SD-26A (Sample #: JCS-522) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1600 hrs: Sediment sample SD-26B (Sample #: JCS-523) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1630 hrs: Equipment rinsate blank sample RB-30 (Sample #: JCW-028: CLP #: A4B54) was collected from hand auger sampling equipment (augers, scoops, etc.) associated with sediment sampling activities.
- 1650 hrs: Sediment sample SD-22A (Sample #: JCS-515) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1700 hrs: Sediment sample SD-21A (Sample #: JCS-514) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1703 hrs: Sediment sample SD-23A (Sample #: JCS-516) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1705 hrs: Sediment sample SD-23B (Sample #: JCS-517) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
  - In addition, sediment sample SD-28A (Sample #: JCS-526) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1706 hrs: Sediment sample SD-24A (Sample #: JCS-518) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
- 1710 hrs: Sediment sample SD-24B (Sample #: JCS-519) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
  - In addition, sediment sample SD-28B (Sample #: JCS-527) was collected using a hand auger at a depth of 12 to 24 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.
  - Also, sediment sample SD-29A (Sample #: JCS-528) was collected using a hand auger at a depth of 0 to 12 inches below the sediment-water interface from the wetland area located west of the Jard property on property P030. The sample was later submitted for PCB field screening analysis.

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USEPA CLP Organics COC (LAB COPY)

DateShipped: 4/18/2013 CarrierName: FedEx AirbillNo: 5141 2418 1040 **CHAIN OF CUSTODY RECORD** 

Case #: 43395 Cooler #: SB100/SB010

No: 1-041813-160255-00<del>17</del>

Lab<sup>-</sup> ChemTech Consulting Group Lab Contact: Divya Mehta Lab Phone: 908-789-8900

Organic Sample #	Matrix/Sampler	Coll. Method	Analysis/Turnaround	Tag/Preservative/Bottles	Station Location	Collected	Inorganic Sample #	For Lab U	lse
	Sediment/		CLP PCBs(21)				2		
A4C23 EE	Sediment/ START	Grab	CEPPCBs(21) THE	844(4.C)(1)	10S-656	04/16/2013 08 45	4	7	
A4C24	Sediment/ START	Grab	CLP PCBs(21)	846 (4 C) (1)	JCS-561	04/16/2013 09:45	- <u> </u>	2	
A4C25	Sediment/ START	Grab	CLP PCBs(21), CLP PCBs(21)	848 (4 C), 849 (4 C) (2)	JCS-566	04/16/2013 10:25	-	Z	7
A4C26	Sediment/ START	Grab	CLP PCBs(21)	851 (4 C) (1)	JCS-570	04/16/2013 11:10			5
A4C27	Sediment/ START	Grab	CLP PCBs(21)	853 (4 C) (1)	JCS-564	04/16/2013 10:00			
A4C28	Sediment/ START	Grab	CLP PCBs(21)	855 (4 C) (1)	JCS-514	04/16/2013 17:00			
A4C29	Sediment/ START	Grab	CLP PCBs(21)	857 (4 C) (1)	JCS-565	04/16/2013 10:20	ya y		
A4C30	Sediment/ START	Grab	CLP PCBs(21)	860 (4 C) (1)	JCS-585	04/16/2013 11:10			
A4C31	Soil/ START	Grab	CLP PCBs(21)	· 862 (4 C) (1)	JCS-586	. 04/17/2013 07:00		<del>)</del>	
A4C32	Soil/ START	Grab	CLP PCBs(21)	863 (4 C) (1)	JCS-587	04/17/2013 07:00	¢	<b>)</b>	
A4C33	Soil START	Grab	CLP PCBs(21)	864 (4 C) (1)	JCS-341	04/11/2013 12:05			

		<i>^</i>
		Shipment for Case Complete (Y)
Sample(s) to be used for Lab QC: A4C25	TTMP: 4(	Samples Transferred Grom Chain of Custody #
·		1 147
Analysis Key: CLP PCBs=SOM01.2 Aroclors		

Items/Reason	Relinquished by	Date	Received by	Date	Time	Items/Reason	Relinquished By	Date	Received by	Date	Time
Samples	Auplika	4/18/13	Airbill#   5141 24181040	4/18/13	1640						<b>—</b>
0 00 11 204	0	11.01.	0191 8410.04								-
											+ .
	——————————————————————————————————————		·	-		D. mala C	Airbill#		OH TEXA	4/19/13	0120
						Samples	5141 2418 1040		JULIU ICELIA	1411412	100

Except: A4CZZ

DG/ESAT

LABORATORY NAME:

### ORGANICS COMPLETE SDG FILE (CSF) INVENTORY SHEET FORM DC-2

CHEMTECH CONSULTING GROUP, INC.

Jard Company Weston

	CITY / STATE : MO	UNTAINSIDE, NJ		•		
	CASE NO : 43395	SDG NO : A4C22				,
	SDG NOs TO FOLLOW	N/A N/A		_		
•	MOD. REF. NO. :	N/A		N/A		
į	CONTRACT NO:	EPW11030				
	SOW NO:	SOM 01.2			Jun 1	<b>7</b> 201 <b>3</b>
	All documents delivered in ti	ne Complete SDG File (CSF) must be original docur		possible. AGE NOS:	CHE	CK Wester
١.	inventory Sheet (DC-2) (i	Do not number)	FROM	то	LAB	UBEPA
2,	SDG Narrative		1	4		
3.	SDG Cover Sheet/Traffic	Report	5	6		
Į.	Trace Volatiles Data				•	
	a. QC Summary  Deuterated Monit and VOA-2)	oring Compound Recovery (Form II VOA-1	NA	NA		<u>_</u>
	Matrix Spike/Matr	ix Spike Duplicate Recover (Form III VOA) SEPA Region)	NA	NA		
	Method Blank Su	mmary (Form IV VOA)	NA	NA		_
	GC/MS Instrumer	t Performance Check (Form V VOA)	NA	NA		
	Internal Standard	Area and RT Summary (Form VIII VOA)	NA	NA		
	b. Sample Data TCL Results - Org and VOA-2)	ganics Analysis Data Sheet (Form I VOA-1	NA	NA		
	Tentatively Identif	ied Compounds (Form I VOA-TIC)				_
	Reconstructed to	al ion chromatograms (RIC) for each sample				
	For each sample	•			· · · · · · · · · · · · · · · · · · ·	
	Raw Spectra a target compou	nd background-subtracted mass spectra of nds identified	•			
	Quantitation re	ports				
	Mass Spectra c. Standards Data (All	of all reported TICs with three best library matches Instruments)	<u>NA</u>	NA		
	initial Calibration	Data (Form VI VOA-1, VOA-2, VOA-3)				
	RICs and Quantit	aation Reports for all Standards				
	Continuing Calibra	ation Data (Form VII VOA-1, VOA-2, VOA-3)				
	RICs and Quantit	ation Reports for all Standards				
	d. Raw/Quality Control				<u> </u>	
	BFB		NA	NA		
	Blank Data		NA	NA ·		<u> </u>
	Matrix Spike/Matrix USEPA Region)	Spike Duplicate Data (if requested by	NA	NA -		i/

CASE N	NO: 43395 SDG NO: A4C22	SDG NOs TO	FOLLOW:	N/A		
N/A	N/A	MOD. REF.	NO: N	/A .		
	DINE D. L. (Discovered of the Trees Volati	iles Section	NA NA	NA NA	/	
e. T	race SIM Data (Place at the end of the Trace Volati [Form I VOA-SIM; Form II VOA-SIM1 and VOA-SI		147.	· · · · · · · · · · · · · · · · · · ·	<u></u>	
	IV-VOA-SIM; Form VI VOA-SIM; Form VII VOA-SI VIII VOA-SIM; and all raw data for QC, Samples, a	IM; Form				L
i.ow/l	Standards.] Med Volatiles Data					
	QC Summary					
	Deuterated Monitoring Compound Recovery.(Form VOA-2, VOA-3, VOA-4)	n II VOA-1,	NA	NA		ر,
	Matrix Spike/Matrix Spike Duplicate Recovery (Fo and VOA-2) (if requested by USEPA Region)	rm III VOA-1	NA	NA .		
	Method Blank Summary (Form IV VOA)		NA	NA	. <u> </u>	
	GC/MS Instrument Performance Check (Form V V	/OA)	<u>NA</u>	NA ·		
•	Internal Standard Area and RT Summary (Form V	/III VOA)	NA	NA		
b. 5	Sample Data		NA	NA		
	TCL Results - Organics Analysis Data Sheet (For VOA-1 and VOA-2)	m 1				
	Tentatively Identified Compounds (Form I VOA-T	IC)				
	Reconstructed total ion chromatograms (RIC) for	each sample				
	For each sample: Raw Spectra and background-subtracted mataget compounds identified	ass spectra of				
	Quantitation reports					
	Mass Spectra of all reported TICs with three matches	best library				
Ç.	Standards Data (All Instruments		NA	<u>NA</u>	_	
	Initial Calibration Data (Form VI VOA-1, VOA-2,	VOA-3)				
	. RICs and Quantitation Reports for all Standards			•		
	Continuing Calibration Data (Form VII VOA-1, Vo	OA-2, VOA-3)				
	RICs and Quantitation Reports for all Standards					
d.	Raw/Quality Control (QC)Data	•			,	
	ВFВ		NA	<u>NA</u>		
	Blank Data	•	<u>NA</u>	NA NA		
	Matrix Spike/Matrix Spike Duplicate Data (if requ USEPA Region)	ested by	NA —	NA		

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6.

CA	SE NO: 43395 SDG NO:	A4C22 SDG NO	Os TO FOLLOV	V: <u>N/A</u>		
N	/A N/A	MOD. R	REF. NO :	N/A		
Sei	mivolatiles Data					<del> </del>
a.	QC Summary					
	Deuterated Monitoring Compound SV-2, SV-3, SV-4)	Recovery (Form II SV-1,	NA	<u>NA</u>		
	Matrix Spike/Matrix Spike Duplicate (Form III SV-1 and SV-2) (if requesting		NA	<u>NA</u>		
	Method Blank Summary (Form IV S	SV)	. NA	NA		
	GC/MS Instrument Performance C	heck (Form V SV)	NA	<u>NA</u>		
	Internal Standard Area and RT Sur and SV-2)	nmary (Form VIII SV-1	NA ·	NA NA		
b.	Sample Data		. NA	NA	•	
	TCL Results - Organics Analysis D SV-2)	ata Sheet (Form I SV-1 and		•		
	Tentatively Identified Compounds (	Form I SV-TIC)		:		
	Reconstructed total ion chromatogi	rams (RIC) for each sample				<u></u>
	For each sample:		NA	<u>NA</u>		• •
•	Raw Spectra and background-s target compounds	ubtracted mass spectra of				
	Quantitation reports					
	Mass Spectra of TICs with three	e best library matches				
	GPC chromatograms (if GPC is	Γ	-			
c.	Standards Data (All Instruments)		NA	NA		
	Initial Calibration Data (Form VI SV	/-1, SV-2, SV-3)				/
	RICs and Quantitation		•			
	Continuing Calibration Data (Form	VII SV-1, S				
	RICs and Quantitation Reports for	all Standards	•			
d.	Raw (QC)Data					
	DFTPP		NA	<u>NA - </u>		
	Blank Data		NA	<u>NA</u>		
	MS/MSD Data (if requested by USI	EPA Region)	NA	<u>NA</u>		
e.	Raw GPC Data		NA	NA		/

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CASE	E NO : 43395 SDG NO : A4C22	SDG NOs	TO FOLLO	W: N/A		
N/A	N/A	MOD. REF	. NO :	N/A		
<del></del>	Semivolatile SIM Data		NA	NA NA		
	· [Form I SV-SIM; Form II SV-SIM1 and SV-SIM2; III-SV-SIM1 and SV-SIM2 (if required; Form IV S Form VI SV-SIM; Form VII SV-SIM; Form VII SV-SIM2; and all raw data for QC, Samples, and	SV-SIM; V-SIM1 and				
Pesti	icides Data					
a. (	QC Summary					
;	Surrogate Recovery Summary (Form II PEST-1 and	d PEST-2)	NA	NA		
	Matrix Spike/Matrix Spike Duplicate Recovery Sum (Form III PEST-1 and PEST-2)	mary	<u>NA</u>	<u>NA</u>		
	Laboratory Control Sample Recovery (Form III PES PEST-4)	ST-3 and	NA	<u>NA</u>		
	Method Blank Summary (Form IV PEST)		NA	NA		
. Sa	mple Data		NA	NA		
	TCL Results - Organics Analysis Data Sheet (Form	1 PEST)				
	Chromatograms (Primary Column)					
	Chromatograms from second GC column confirma	tion				
	GC Integration report or data system printout					
	Manual work sheets					
	For Pesticides by GC/MS					
	Copies of raw spectra and copies of backgroun spectra of target compounds (samples & standa					
c. St	andards Data		NA	NA	•	
	Initial Calibration of Single Component Analytes (F	Form VI PEST-1 and	PEST-2)			<u></u>
	Toxaphene Initial Calibration (Form VI PEST-3 and					
	Analyte Resolution Summary (Form VI PEST-5, p					
	Performance Evaluation Mixture (Form VI PEST-6	3)	•		<del></del>	
	Individual Standard Mixture A (Form VI PEST-7)					
	Individual Standard Mixture B (Form VI PEST-8)			•		
	Individual Standard Mixture C (Form VI PEST-9 a	nd PEST-10)				
	Calibration Verification Summary (Form VII PEST	·-1)				
	Calibration Verification Summary (Form VII PEST	·-2)				

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CASE NO: 43395 SDG NO: A4C22 SDG	NOs TO FOLLOW	/: N/A		•
N/A N/A MOD	REF. NO :	N/A		
Calibration Verification Summary (Form VII PEST-3)		<del></del>		L
Calibration Verification Summary (Form VII PEST-4)				
Analytical Sequence (Form VIII PEST)				
Florisil Cartridge Check (Form IX PEST-1)		_		
Pesticide GPC Calibration (Form IX PEST-2)		_		ب
Identification Summary for Single Component Analytes (Form X Pl	EST-1)			ر
Identification Summary for Toxaphene Form X PEST-2)		,		
Chromatograms and data system printouts				
A printout of Retention Times and corresponding peak areas of	or peak heights			
d. Raw QC Data				-
Blank Data	NA	NA -		
Matrix Spike/Matrix Spike Duplicate Data	NA:	<u>NA</u>		
Laboratory Control Sample	NA.	NA		
e. Raw GPC Data	. <u>NA</u>	<u>NA</u>		
f. Raw Florisil Data	ŅA	NA		
Aroclor Data				
a. QC Summary			. ,	
Surrogate Recovery Summary (Form II ARO-1 and ARO-2)	7	7		
Matrix Spike/Matrix Spike Duplicate Summary (Form III ARO-1 and ARO-2)	<u>8</u>	9		<u> </u>
Laboratory Control Sample Recovery (Form III ARO-3 and ARO-4)	10	10		
Method Blank Summary (Form IV ARO)	11	11		
b. Sample Data	12	17	•	
TCL Results - Organics Analysis Data Sheet (Form I ARO)	NA	<u>NA</u>		
Chromatograms (Primary Column)	<u>NA</u>	<u>NA</u>		
Chromatograms from second GC column confirmation	· <u>NA</u>	<u>NA</u>		
GC Integration report of data system printout	NA	NA		
Manual work sheets	NA	NA		
For Aroclors by GC/MS	NA	NA		

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# ORGANICS COMPLETE SDG FILE (CSF) INVENTORY SHEET FORM DC-2.

CASE NO: 43395	SDG NO: A4C22	SDG NOs T	o Follow	: <u>N/A</u>		
N/A	N/A	MOD. REF.	NO:	N/A		
Copies of raw spectra background-subtracte compounds (samples	ed mass spectra of target			•		· •
, Standards Data		•	18	60		
Aroclors Initial Calibration	(Form VI ARO-1,ARO-2,	and ARO-3)				<u> </u>
Calibration Verification Su	mmary (Form VII ARO-1)			•		
Analytical Sequence (For	m VIII ARO)					ب
. Identification Summary fo	r Multicomponent Analytes	s (Form X ARO)			<u> </u>	
Chromatograms and data	system printouts					ں
A printout of Retent or peak heights	ion Times and correspond	ing peak areas				
i. Raw QC Data		_			` /	
Biank Data			61	<u>77                                   </u>		<u> </u>
Matrix Spike/Matrix Spike	Duplicate Data		78	85		
Laboratory Control Samp	ile (LCS) Data	•	86	89		
e. Raw GPC Data (if performe	d)	•	NA	<u>NA</u>		
Miscellaneous Data					•	
Original preparation and a and analysis logbook page		preparation	90	118		
Internal sample and samp records	le extract transfer chain-of	f-custody	123	123		
Screening records			<u>NA</u>	<u>NA</u>		
All instrument output, incli activities (describe or list)	uding strip charts from scre	eening	-			
						_
EPA Shipping/Receiving Doo			119	119		
Airbills (No. of shipments		•				
Chain of Custody Record	<b>s</b> .		120	120	- <del></del>	
Sample Tags						
Sample Log-in Sheet (La	b & DC-1)		121_	122		
Miscellaneous Shipping/i	Receiving Records (descri	be or list)			-	

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# ORGANICS COMPLETE SDG FILE (CSF) INVENTORY SHEET FORM DC-2

Γ	CASE NO :	43395	SDG NO : A4C22	SDG NOs TO FOLLO	: WC	N/A		
	N/A		<u>N/A</u>	MOD. REF. NO :	N/	/A		
11.	Internal La	ab Samp	le Transfer Records and Tracking S	heets (describe or list)				
	Sa	mple Tra	nsfer	123		123		
12.	Other Rec	ords (de	scribe or list)					,
	Telepi	hone Co	mmunication Log	124		143		
	<del></del>	———		<del></del>				
13.	Comment	s						
				•				
			· .			•		
	mpleted by:		Shell	Shell	7.11.0	Lube ne/Otle)		06/14 13
(	(CLP Lab)		(Signature)				L.	1 1.
	rified by: (CLP Lab)	_	(Signature)			Prajaja ne/Title)	<del></del>	0-8 (14     3 (Date)
Αц	dited by:	_\	Mull	William WM	han	, flin. Paj. s	cientif	6/26/13
	(USEPA) Lives	the	(Signature)	(Printed	Nam	ne/Title)		(Date)

**Evidence Audit Photocopy** 

HRS Reference #85



# EPA NEW ENGLAND COMPLETE SDG FILE RECEIPT / TRANSFER FORM

Site: Jard Company Inc.

TDD: 09@17-10-0008

TASH: 0850

Receipt.	Received By : Name	Init.	Affiliation	CSF Activity	Custody Seals Present / Intact	Released To	Date
06/17/13	Doris Guzman	De	ESAT	Received for Transfer	YN YN	Westen	06/17-1-13
6/19/13	Bill Mahary	(0)	Weston	Storese + vilidation	(D) ON		
1111/2					YN YN		
¥-	·				YN YN		
					YN YN		
		<del></del>			YN YN		
***		-			YN YN		
			,		YN YN		<u> </u>
					YN YN		• •
					YN YN		
P age					YN YN	·	
Page 39 of 7			<del> </del>		Y N . Y·N		

#### EPA-NE - DQO SUMMARY FORM

A separate Form should be completed for each sampling event. Refer to Attachment A for instructions on completing this form, Attachment B for a complete list of the parameter codes and Attachment C for an example of a completed form.

1.	EPA Program: TSCA CERCLA RCRA DW NPDES CAA Other: Projected Date(s) of Sampling Spring (April/May) 2013 EPA Site Manager Martha Bosworth EPA Case Team Members  EPA Case Team Members  Site Name Jard Company Inc Site Location Bennington, Vermont  Assigned Site Latitude/Longitude 42° 53' 21.5" north/73° 11' 21.9" west CERCLA Site/Spill Identifier NoVID048141741 (Include Operable Unit) Phase: ERA SA/SI pre-RI RI (phase I, etc.) FS RD RA post-RA (circle one) Other: Site Reassessment						Unit)		
2.	Water, and Sediment Sampling Jard Approved by: Martha Bosworth Title of Approving Official: Site As	Title of Approving Official: Site Assessment Manager Organization*: EPA  *If other than EPA, record date approval authority was delegated:							
	EPA Oversight Project (circle one) Confirmatory Analysis for Field Scr Are comparability criteria document			Type of EPA O					
3. a.	Matrix Code!	so	so	so	GW	GW	SD	SD	SD
ъ.	Parameter Code <sup>2</sup>	PCB Aroelors	PCB Aroclors	PCB Congeners	PCB Aroclors	PCB Congeners	PCB Aroclors	PCB ·	PCB Congeners
c,	Preservation Code <sup>3</sup>	5	5	5	5	5	5	5	5
đ.	Analytical Services Mechanism	DAS or ĆĽP	DAS or CLP	CLP	DAS or CLP	DAS or CLP	DAS or CLP	DAS or CLP	CLP
e.	No. of Sample Locations	65	28	2	· 21	2 ·	60	60	60
	Field QC:								
£	Field Duplicate Pairs	4	2	]	2	. 5	5	5	5
g.	Equipment Blanks	See RB	See RB	See RB	See RB	See RB	Sec RB	See RB	See RB
h.	VOA Trip Blanks	0	0	. 0	0	0	0	, 0	0
i.	Cooler Temperature Blanks	l per cooler	l pçr cooler	1 per	l per cooler	l per cooler	l per cooler	l per cooler	1 per cooler
j.	Bottle Blanks	0	0	0	· o	. 0	0	0	0
<b>k</b> .	Other:						•		
1.	PES sent to Laboratory	NA	6	TBD	3	TBD	NA	3	TBD
	Laboratory QC:								
m.	Reagent Blank	0	0	0	o	0	0	0	0 ·
n.	Duplicate	0	0	0	.0	0	0	0	0
о.	Matrix Spike	0	2	0	1	0	1	0	0
p.	Matrix Spike Duplicate	0	2	0	_1	0	1	0	0
q.	Other:								
4.	List all potentially contaminated mat Range of Depth to Groundwater of Soil Types: Surface Subsurface O								

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1.	FPA Program: TSCA CERCLA RCRA DW NPDES CAA Other:  Projected Date(s) of Sampling Spring (April/May) 2013  EPA Site Manager Martha Bosworth  EPA Case Team Members  Site Name Jard Company Inc  Site Na							le Unit)	
2.	Water, and Sediment Sampling Jard Approved by Martha Bosworth	Title of Approving Official: Site Assessment Manager Organization*: EPA *If other than EPA, record date approval authority was delegated:							
	EPA Oversight Project (circle one) Confirmatory Analysis for Field Sor Are comparability criteria document		N If	ype of EPA Over EPA Oversight	rsight (oircle or Confirma	one) PRP ( tory: % split	or FF Other:_ s_TBD	,·-·	
3. a.	Matrix Code <sup>1</sup>	SS	ss	SS	RB				
ъ.	Parameter Code <sup>2</sup>	PCB Aroclors	PCB Aroclors	PCB Congeners	PCB Aroclors				
¢.	Preservation Code <sup>3</sup>	5	5	5	5			•	
d.	Analytical Services Mechanism	DAS or CLP	DAS or CLP	CLP	CLP Non- RAS				
e.	No. of Sample Locations	125	38	2	21				İ
	Field QC:	1					, ,		
f.	Field Duplicate Pairs	7	2.		0			,	
g.	Equipment Blanks	Sec RB	See RB	See RB	0				
h.	VOA Trip Blanks	0	0	0	0				
i.	Cooler Temperature Blanks	l per cooler	l per cooler	l per cooler	1 per cooler				
j.	Bottle Blanks	0	0	0	0		-		
k.	Other:		,						
1.	PES sent to Laboratory	NA.	6	TBD	Ö				
	Laboratory QC:								
m.	Reagent Blank	0	. 0	0	0				
n.	Duplicate	0	0	0	0				
0.	Matrix Spike	0	2	0	0				
p.	Matrix Spike Duplicate	0	2	0					
q.	Other:					,			
4.	Site Information Site Dimensions Approximately 11 List all potentially contaminated ma Range of Dight to Grundwater Soil Types: Surface Subsurface C Sediment Types: Stream Pond Es	trices <u>Surface</u> : reater than 5 fe Other:	<u>et</u> )	soil, sediment,	<u> </u>	_	ntial surface sc ent Moisture C		Low

When m	ultiple matrices will be sampled during a san	apling event, complete Sections 5-10 for	ach matrix.		Matrix Code <sup>1</sup> SO			
5. Data l	Engineering D	tent of Contamination Human and/or I	cological Risk 1	Assessment	Other:			
			Draft DQO S	ummary For	n 11/96			
6.	Summarize DQOs: Collect surface and subsurface soil/source samples from the identified source area (capped former building footprint and excavated staged material) on the property for PCB Aroclors field screening and fixed based laboratory analysis in source areas on the Jard Company Inc property. A subset of samples will be submitted for fixed laboratory analysis with a smaller subset submitted for PCB Congener analysis.							
		1	<del></del>					
_	Complete Table if applicable							
		T		Γ				
	COCs	Action Levels		Ana	lytical Method-Quantitation Limits			
PCB Are	oclors (Field Screening)	Above Background (Assumed to be N	D)	0.2 mg/Kg	<del></del>			
	pelors (Fixed Lab)	Above Background (Assumed to be N	D)	33 ug/kg				
PCB Cor	ngerners	Above Background (Assumed to be N	D)	20 to 100 r	1 <u>¢</u> /Kg			
<del> </del>								
				<u>                                     </u>				
			<del></del>	<u> </u>				
7.	List Background Sample Locations NA Circle Grab or Composite	Split Spoon Dredge Trow  Rev. #. and date)	et or Spigot el		Peristaltic Pump Other: irect sampling			
	"Hot spots" sampled: Yes	No	<del></del>					
8.	Field Data (cirole) ORP pH Other:	Specific Conductance Disse	olved O2	Temperatu	re Turbidity			
9.	Analytical Methods and Parameters							
	Method title/SOP name	Method/SOP Identification number	Revision	n Date	Target Parameters (VOA, SV. Pest/PCB, Metals, etc.)			
	PCB Aroclors (Field Screening)	EIA-FLDPCB2.SOP			PCBs			
	PCB Aroclors	SOM01.2 or DAS Equivalent	<del>,,,</del>		PCBs			
	PCB Congeners	CBC01.0			PCB Congeners			
10.	2. Other Validation Tier (circle one) I (	on I. EPA-NE Data Validation Functional Approved Validation Criteria: II Partial Tier III: a Validation Weston Solutions, Inc./ST.			or Subcontractor (circle one)			
11.	Company Name <u>Weston Solutions, Inc.</u> Contract Name (e.g. START, RACS, et Person Completing Form/Title <u>G. Horn</u>		mber EP-W-0 nment No. 201 Summary Forn	14-081-998-				

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	Engineering I Post-Remedia	xtent of Contamination . Human and/or	а		Removal Actions Remediation Altematives Other:
	Summarize DOOs: Collect around water				
	Summarize DOOs: Callect around water		Draft DQO St	ımmary Form	11/96
	fixed based laboratory analysis. A sub	r samples from ground water monitoring set of samples will be submitted for PCB	wells previously Congener analys	installed on a	and off the property for PCB Aroclors
	Complete Table if applicable				
	COCs	Action Levels		Anal	ytical Method-Quantitation Limits
CB Arocl	lors (Fixed Lab)	Above Background (Assumed to be N	ND)	1.0 μg/L	
CB Cong	eners	Above Background (Assumed to be N	(D)	100 to 1,00	0 pg/L
					•
		<u> </u>			<del></del> .
	<del></del>	<del></del>		· · · · ·	
	Sampling Procedures (SOP name, No. List Background Sample Locations C Circle Grab or Composite "Hot spots" sampled:	Split Spoon Dredge Tro  Rev. #, and date)  round Water monitoring wells TBD  No	wel	Other:	
	Field Data (circle) ORP DH		solved O	Temperatur	Turbidity
				-•	
<u> </u>	Analytical Methods and Parameters				
Ī	Method title/SOP name	Method/SOP Identification number	Revision	n Date	Target Parameters (VOA, SV, Pest/PCB, Metals, etc.)
	PCB Aroclors	SOM01.2 or DAS Equivalent			PCBs
ſ	PCB Congeners	CBC01.0			PCB Congeners
·[			1		-
		ion I. EPA-NE Data Validation Functions er Approved Validation Criteria:	al Guidelines for	Evaluating E	nvironmental Analyses, Part II, III or IV
0.		II III Partial Tier III:			
0.	Validation Tier (circle one) I Company/Organization Performing D	ata Validation Weston Solutions, Inc./ST	TART III	Prime	or Subcontractor (circle one)
1.		<del>-</del>	TART III Jumber EP-W-0		or Subcontractor (circle one)

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When m	ultiple matrices will be sampled during a sam	pling event, complete Sections 5-10 for	each matrix.		Matrix Code SD
5. Data l	Engineering D	ent of Contamination Human and/or F			Removal Actions Remediation Alternatives Other:
		<u> </u>	Draft DQO S	ummary Fort	n 11/96
6.	Summarize DQOs: Collect sediment sam analysis. A subset of samples will be su	ples from a wetland located west of Park bmitted for fixed laboratory analysis with	Street for PCB a smaller subs	Aroclors fielet submitted	d screening and fixed based laboratory for PCB Congener analysis
	Complete Table if applicable				
	COCs	Action Levels		Ana	lytical Method-Quantitation Limits
PCB Aro	olors (Field Screening)	Above Background (Assumed to be N	D)	0.2 mg/Kg	
PCB Ara	oclors (Fixed Lab)	Above Background (Assumed to be N	D)	33 ug/kg	
PCB Cor	gemers	Above Background (Assumed to be N	D)	20 to 100 r	ng/Kg
				<u>.</u>	
	·		<u>.</u>		
	<u> </u>	,			
7.	Sampling Method (circle technique)  Sampling Procedures (SOP name, No.,	Split Spoon Dredge Trow	et or Spigot rel	No) Other: D	Peristaltic Pump Other: irect sampling
•	Circle: Grab or Composite  "Hot spots" sampled:  Yes	No	v inc property		
8.	Field Data (oircle) ORP pH Other:	Specific Conductance Disse	oived O2	Temperatu	re Turbidity
9.	Analytical Methods and Parameters				
,	Method title/SOP name	Method/SOP Identification number	Revisio	n Date	Target Parameters (VOA, SV, Pest/PCB, Metals, etc.)
•	PCB Aroclors (Field Screening)	SOM01.2			PCBs
	PCB Aroclors	SOM01.2 or DAS Equivalent	· <del>-</del>		PCBs
	Total Metals (including Hg)	CBC01.0			PCB Congeners
10.	2. Other Validation Tier (circle one) I (	on I. EPA-NE Data Validation Functional Approved Validation Criteria: III Partial Tier III: a Validation Weston Solutions, Inc./ST			invironmental Analyses. Part II, III or IV
11.	Company Name <u>Weston Solutions. Inc.</u> Contract Name (e.g. START, RACS, et Person Completing Form/Title <u>G. Horr</u>		imber_EP-W-( nment No. 201 Summary Forn	14-081-998-	

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	· Engineering l	xtent of Contamination Human and/or Eco Design Remedial Action al Action (quarterly monitoring)	ologicat Kisk	Assessment	Other:
			Draft DQO S	ummary Forn	11/96
	recidences for DCB. Arcolors field sore	samples from residential properties downgra ening and fixed based laboratory analysis in poratory analysis with a smaller subset aubm	source areas itted for PCB	on the Jard C Congener an	ompany Ine property. A subset of alvais.
	Complete Table if applicable				
	COCs	Action Levels		Ana	lytical Method-Quantitation Limits
CB Ą	roclors (Field Screening)	Above Background (Assumed to be ND	)	0.2 mg/Kg	<u></u>
CB A	roclors (Fixed Lab)	Above Background (Assumed to be ND	)	33 ug/kg	
<u>св с</u>	ongerners	Above Background (Assumed to be ND	)	20 to 100 r	ng/Kg
		<u> </u>	<del>,</del>	_	
	·	<del></del>		<del> </del> -	
	Sampling Method (circle technique)  Sampling Procedures (SOP name, No List Background Sample Locations I Circle: Grab or Composite "Hot spots" sampled:	Split Spoon Dredge Trowe	t or Spigot il		Peristaltic Pump Other: irect sampling
	Field Data (circle) ORP pH	Specific Conductance Dissol		Temperatu	
	Analytical Methods and Parameters				<del></del>
	Method title/SOP name	Method/SOP Identification number	Revisio	on Date	Target Parameters (VOA, SV, Pest/PCB, Metals, etc.
	PCB Aroclors (Field Screening)	SOM01.2			PCBs
	PCB Aroclors	SOM01.2 or DAS Equivalent			PCBs
	Total Metals (including Hg)	CBC01.0			PCB Congeners
	Validation Criteria (circle one) 1. Re	gion I. FPA-NE Data Validation Functional her Approved Validation Criteria: II Partial Tier III:			Environmental Analyses, Part II, III or
). -	Validation Tier (circle one) I	Data Validation Weston Solutions, Inc./STA	ART III	Prim	

K<sub>2</sub>Cr<sub>2</sub>O<sub>7</sub>
Freeze
Room Temperature (avoid excessive heat)
Other (Specify)
Not preserved

-mga wa sa L

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# Attachment C

Original Analytical Results (Form I's) Case No. 43395; SDG No. A4C22

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# 1H - FORM I ARO AROCLOR ORGANICS ANALYSIS DATA SHEET

EPA	SAMPLE	NO.
	A4C22	

Lab Name: Chemtech Contract	et: USEPA CLP Organic	cs
Lab Code: CHEM Case No.: 43395 Mod. Ref	No.: <u>E2426</u> SDG	No.: A4C22
Matrix: (SOIL/SED/WATER) SOIL	Lab Sample ID:	E2426-01
Sample wt/vol: 50.0 (g/mL) g	Lab File ID:	PB005848.D
% Moisture: 72.0 Decanted: (Y/N) N	Date Received:	04/19/2013
Extraction: (Type) SOXH	Date Extracted:	05/31/2013
Concentrated Extract Volume: 10000 (uL)	Date Analyzed:	06/03/2013
Injection Volume: 1.0 (uL) GPC Factor: 1.0	Dilution Factor:	1.0
GPC Cleanup: (Y/N) N pH: 6.68	Sulfur Cleanup: (	Y/N) <u>N</u>
Acid Cleanup: (Y/N) Y		

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) ug/Kg	Q
12674-11-2	Aroclor-1016	71	ซ
11104-28-2	Arocior-1221	71	ש
11141-16-5	Aroclor-1232	. 71	U
53469-21-9	Aroclor-1242	71	<u>U</u>
12672-29-6	Aroclor-1248	71	<u> </u>
11097-69-1	Aroclor-1254	71	<u>U</u>
11096-82-5	Aroclor-1260	71 71	<u> </u>
37324-23-5	Aroclor-1262	71	<del> </del>
11100-14-4	Aroclor-1268	/1	

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Pa″+ 1.

#### 1H - FORM I ARO AROCLOR ORGANICS ANALYSIS DATA SHEET

LPA	SAMPLE	NO.
	A4C23	

Lab Name: Chemtech	Contract:	USEPA CLP Organic	es
Lab Code: CHEM Case No.: 43395 Mo	od. Ref No.:	E2426 SDG	No.: A4C22
Matrix: (SOIL/SED/WATER) SOIL		Lab Sample ID:	E2426-02
Sample wt/vol: 50.1 (g/mL) g		Lab File ID:	PB005849.D
% Moisture: 83.0 Decanted: (Y/N) N		Date Received:	04/19/2013
Extraction: (Type) SOXH		Date Extracted:	05/31/2013
Concentrated Extract Volume: 10000 (uL)		Date Analyzed:	06/03/2013
Injection Volume: 1.0 (uL) GPC Factor:	1.0	Dilution Factor:	1.0
GPC Cleanup: (Y/N) N pH: 7.01		Sulfur Cleanup: ()	/N) <u>N</u>
Acid Cleanup: (Y/N) Y			

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) ug/Kg	. Q
12674-11-2	Aroclor-1016	120	U
11104-28-2	Aroclor-1221	120	Ū
11141-16-5	Aroclor-1232	120	. ប
53469-21-9	Aroclor-1242	120	U
12672-29-6	Aroclor-1248	120	υ
11097-69-1	Aroclor-1254	120	U
11096-82-5	Aroclor-1260	120	U
37324-23-5	Aroclor-1262	120	υ
11100-14-4	Aroclor-1268	120	U

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#### Attachment D

USEPA Contract Laboratory Program Statement of Work for Organic Analysis,
Multi-Media Multi-Concentration, SOMO1.2 (Excerpt)
and
Modifications Updating SOM01.1 to SOM01.2, October 5, 2006, Updated 02-12-2007,
Amended 04-11-2007 (Excerpt)

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# 4.0 AROCLORS TARGET COMPOUND LIST AND CONTRACT REQUIRED QUANTITATION LIMITS1

•		<u>Qu</u> antitati	Quantitation Limits	
•		Water	Soil	
Aroclors	CAS Number	ug/L	µg/kq	
141. Aroclor-1016	12674-11-2	1.0	33 .	
142. Aroclor-1221	11104-28-2	1.0	33 ·	
143. Aroclor-1232	11141-16-5	1.0	33	
144. Aroclor-1242.	53469-21-9	1.0	33	
145. Aroclor-1248	12672-29-6	1.0	33	
46. Aroclor-1254	11097-69-1	. 1.0	33	
147. Aroclor-1260	11096-82-5	1.0	33	
148. Aroclor-1262:	37324-23-5	1.0	33	
149. Aroclor-1268	11100-14-4	1.0	33	

<sup>&</sup>lt;sup>1</sup>There is no differentiation between the preparation of low and medium soil samples in this method for the analysis of Aroclors.

<	EXHIBIT D – AROCLORS
EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 1	The following Section:
Exhibit D - Aroclor: Section 7.2.3.4.1	
	"Prepare five-point initial calibration standard solutions containing a
••	mixture of Aroclors 1016 and 1260 at the following suggested levels:
	100; 200; 400; 800; and 1600 ng/mL and surrogates at 5.0, 10, 20, 40
	and 80 ng/mL for tetrachloro-m-xylene and 10, 20, 40, 80 and 160
	ng/mL for decachlorobiphenyl. Also, prepare a single-point initial
	calibration standard solution containing Aroclors 1221, 1232, 1242,
*.·	1248, 1254, 1262, and 1268 at 400 ng/mL and surrogates at 20 ng/mL
	for tetrachloro-m-xylene and 40 ng/mL for decachlorobiphenyl. The
71.	solutions must be prepared every 6 months, or sooner if the solutions
·	have degraded or concentrated."
	To undated to:
	Is updated to:
∴	"Prepare five-point initial calibration standard solutions containing a
	mixture of Aroclors 1016 and 1260 at the following suggested levels:
•	100; 200; 400; 800; and 1600 ng/mL and surrogates at 5.0, 10, 20, 40
	and 80 ng/mL for tetrachloro-m-xylene and 10, 20, 40, 80 and 160
	ng/mL for decachlorobiphenyl. In addition, prepare a single-point
•	initial calibration standard solution containing Aroclors 1221 at 400
	ng/mL including surrogates, tetrachloro-m-xylene at 20 ng/mL and
	decachlorobiphenyl at 40 ng/mL. Also, prepare a single point
	calibration initial calibration standard of Aroclor 1232, 1242, 1248,
	1254, 1262, and 1268 as instructed for Aroclor 1221. Refer to Section
	7.2.3.4.3 for five-point calibration standards of the other Aroclors.
	The solutions must be prepared every 6 months, or sooner if the
	solutions have degraded or concentrated."
Aro-Item 2	The following Section:
Exhibit D - Aroclor: Section 7.2.3.4.2	
,	"Prepare a single-point calibration verification standard solution
·	containing Aroclor 1260 and Aroclor 1016 at 400 ng/mL and surrogates
	at 20 ng/mL for tetrachloro-m-xylene and 40 ng/mL for
· .	decachlorobiphenyl. The solution must be prepared every 6 months, or
	sooner if the solution has degraded or concentrated."
	• ,
	Is updated to:
	"Prepare a single-point calibration verification standard solution
	containing Aroclor 1260 and Aroclor 1016 at 400 ng/mL and
<u> </u>	surrogates, tetrachloro-m-xylene at 20 ng/mL and decachlorobiphenyl
, .	40 ng/mL. Additional individual calibration verification standard
	solution(s) containing any other Aroclor may be prepared when
	necessary at 400 ng/mL, including surrogates, tetrachloro-m-xylene
,	at 20 ng/mL and decachlorobiphenyl at 40 ng/mL. The solution must
	be prepared every 6 months, or sooner if the solution has degraded or
<u> </u>	concentrated."

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 3	The following Section:
Exhibit D - Aroclor: Section 9.2.1	"Summary of Initial Calibration
	Prior to sample analysis (including LCSs and MS/MSDs) and required blanks (method/sulfur cleanup/instrument), each GC/ECD system must be initially calibrated to determine instrument sensitivity and the linearity of Aroclor response. An initial five-point calibration is performed using Aroclors 1016 and 1260 to demonstrate the linearity of the detector response. The other seven Aroclors are calibrated at a single mid-point for pattern recognition. The standards for these seven Aroclors should be analyzed before the analysis of any samples, and may be analyzed before or after the analysis of the five levels of the Aroclor 1016/1260 standards.
	is updated to:
•	Summary of Initial Calibration
	Prior to sample analysis (including LCSs and MS/MSDs) and required blanks (method/sulfur cleanup/instrument), each GC/ECD system must be initially calibrated to determine instrument sensitivity and the linearity of Aroclor response. An initial five-point calibration is performed using Aroclors 1016 and 1260 to demonstrate the linearity of the detector response. The other seven Aroclors can be calibrated at a single mid-point at a minimum, for pattern recognition. The standards for these seven Aroclors should be analyzed before the analysis of any samples, and may be analyzed before or after the analysis of the five levels of the Aroclor 1016/1260 standards.
	Note: All Aroclor target compounds may have five-point calibrations performed initially, prior to sample analyses.  Alternately, as long as a valid five-point calibration of Aroclor 1016/1260 is present, five-point calibrations for any of the remaining Aroclor target compounds may be performed, prior to sample analyses.

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 4	The following Section:
Exhibit D - Aroclor: Section 9.2.2	Each GC/ECD system must be initially calibrated upon award of the contract, whenever major instrument maintenance or modification is performed (e.g., column replacement or repair, cleaning or replacement of the ECD, etc.), or if the calibration verification technical acceptance criteria have not been met. Also, for any sample in which an Aroclor, other than Aroclor 1016 or Aroclor 1260 is detected, results for the specific Aroclor(s) may only be reported if the Aroclor(s) have been calibrated using multipoint standards (five-point). If time remains in the 12-hour period after a valid five-point initial calibration for a detected Aroclor(s) has been performed, then samples containing the Aroclor(s) may be analyzed. If the previously-analyzed five-point initial calibration containing the Aroclor(s) detected in the sample(s) is not in the same 12-hour sequence, then the sample(s) must be analyzed after a Continuing Calibration Verification (CCV) analysis containing the Aroclor(s) detected in the sample(s) that meets the criteria for CCVs in Section 9.3.
	is updated to:  Each GC/ECD system must be initially calibrated upon award of the contract, whenever major instrument maintenance or modification is performed (e.g., column replacement or repair, cleaning or replacement of the ECD, etc.), or if the calibration verification technical acceptance criteria have not been met. Also, for any sample, in which an Aroclor (other than Aroclor 1016 or Aroclor 1260) is detected, for which a valid five point calibration curve is not available, results for these specific Aroclors must be reported as an estimated concentration with the appropriate compound qualifier. Subsequently, the sample must be re-analyzed following a valid five point calibration of the specific Aroclor. All sample analysis, must be preceded by an opening CCV with an Aroclor 1016/1260 CS3 standard, at a minimum. Additional Aroclor opening CCV standards may be analyzed at the laboratory's discretion. The closing CCV must include Aroclor 1016/1260 CS3 and all detected Aroclors in the sample. When an Aroclor, other than Aroclor 1016/1260, is detected in a sample, the closing CCV CS3 standard of this detected Aroclor standard must meet opening CCV technical acceptance criteria in Section 9.3.5, if the sample was not preceded by the Aroclor included as a CS3 standard in the opening CCV."
Aro-Item 5	The following Section:
Exhibit D – Aroclor: Section 9.2.3.3	"If Aroclors other than Aroclor 1016/1260 are detected in an analysis, a separate five point calibration must be prepared (Section 7.2.3.4.3) and run for that particular Aroclor."
	is updated to:  "If Aroclors other than Aroclor 1016/1260 are detected in a sample analysis, following a single-point calibration for that particular Aroclor, a separate five-point calibration must be prepared (Section 7.2.3.4.3) and run for that particular Aroclor, followed by a re-analysis of the sample."

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EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 6	Analyze the initial calibration sequence as given below.
Exhibit D – Aroclor: Section 9.2.3.5	3
	Initial Calibration Sequence
	1. Aroclor 1221 CS3 (400 ng/mL)
	2. Aroclor 1232 CS3 (400 ng/mL)
•	3. Aroclor 1242 CS3 (400 ng/mL)
	4. Aroclor 1248 CS3 (400 ng/mL)
	5. Aroclor 1254 CS3 (400 ng/mL)
	-6. Aroclor 1262 CS3 (400 ng/mL)
	7. Aroclor 1268 CS3 (400 ng/mL)
	8. Aroclor 1016/1260 CS1 (100 ng/mL)
	9. Aroclor 1016/1260 CS2 (200 ng/mL)
	10. Aroclor 1016/1260 CS3 (400 ng/mL)
	11. Aroclor 1016/1260 CS4 (800 ng/mL)
	12. Aroclor 1016/1260 CS5 (1600 ng/mL)
	13. Instrument blank
• .	
	Note: The single-point Aroclor standards may be analyzed
	after the analysis of the five levels of the Aroclor 1016/1260
	standards. The steps pertaining to the instrument blank are
	used as part of the calibration verification as well.
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	is updated to:
,	"Initial Calibration may be performed by any of the following
	sequence Options given below:
<i>.</i>	,
	Initial Calibration Sequence - Option 1
•	1. Aroclor 1221 CS3 (400 ng/mL)
<i>.</i> .	2. Aroclor 1232 CS3 (400 ng/mL)
	3. Aroclor 1242 CS3 (400 ng/mL)
	4. Aroclor 1248 CS3 (400 ng/mL)
ľ	5. Aroclor 1254 CS3 (400 ng/mL)
<u>,</u>	6. Aroclor 1262 CS3 (400 ng/mL)
	7. Aroclor 1268 CS3 (400 ng/mL)
	8. Aroclor 1016/1260 CS1 (100 ng/mL)
	9. Aroclor 1016/1260 CS2 (200 ng/mL)
	10. Aroclor 1016/1260 CS3 (400 ng/mL)
	11. Aroclor 1016/1260 CS4 (800 ng/mL)
	12. Aroclor 1016/1260 CS5 (1600 ng/mL)
·	Note: The single-point Aroclor standards may be analyzed
	after the analysis of the five levels of the Aroclor 1016/1260
	standards in Option 1 above.
	· '
	OR
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EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 6	Initial Calibration Sequence - Option 2
Exhibit D - Aroclor: Section 9.2.3.5	5-points of Aroclor 1016/1260(100ng/mL to 1600ng/mL)
(Cont.)	5-points of Aroclor 1221 (100ng/mL to 1600ng/mL)
	5-points of Aroclor 1232(100ng/mL to 1600ng/mL)
· ·	5-points of Aroclor 1242(100ng/mL to 1600ng/mL)
	5-points of Aroclor 1248(100ng/mL to 1600ng/mL)
1	5-points of Aroclor 1254(100ng/mL to 1600ng/mL)
	5-points of Aroclor 1262(100ng/mL to 1600ng/mL)
	5-points of Aroclor 1268(100ng/mL to 1600ng/mL)
, and the second	OR
	Initial Calibration Sequence - Option 3
1	5-points of Aroclor 1016/1260(100ng/mL to 1600ng/mL)
	5-points or single point Aroclor 1221 (100ng/mL - 1600ng/mL or 400ng/mL)
· .	5-points or single point Aroclor 1232 (100ng/mL - 1600ng/mL or 400ng/mL)
	5-points or single point Aroclor 1242 (100ng/mL - 1600ng/mL or 400ng/mL)
	5-points or single point Aroclor 1248 (100ng/mL - 1600ng/mL or 400ng/mL)
	5-points or single point Aroclor 1254 (100ng/mL - 1600ng/mL or 400ng/mL)
,	5-points or single point Aroclor 1262 (100ng/mL- 1600ng/mL or 400ng/mL)
	5-points or single point Aroclor 1268 (100ng/mL - 1600ng/mL or 400ng/mL)
	Note: Option 2 and 3 Initial Calibration above may be performed in any Aroclor sequence as long as a valid five-point calibration of Aroclor 1016/1260 is present. Refer to Section 7.2.3.4 for initial calibration standard concentrations.

HRS Reference #85

## **MODIFICATION (S)** EXHIBIT/SECTION(S) Aro-Item 7 The following Section: Exhibit D - Aroclor: Section 9.2.4.2 "For Aroclors 1016 and 1260, an RT is measured for a minimum of 3 peaks in each of the five calibration standards and the mean RT (RT) is calculated for each of the peaks as the average of the five values obtained from the five calibration standards. For Aroclors 1221, 1232, 1242, 1248, 1254, 1262, and 1268 an RT is measured for each of the peaks for a single-point calibration standard. If a valid five-point calibration is present for a specific Aroclor then an RT is measured for each of the peaks in each of the five calibration standards and the RT is calculated as the average of the five values for each of the peaks obtained from the five calibration standards. An RT is measured for the surrogates in each of the five calibration standards and the RT is calculated as the average of the five values. Calculate the RT using Equation 1: is updated to: "For Aroclors 1016 and 1260, an RT is measured for a minimum of 3 peaks in each of the five calibration standards and the mean RT (RT) is calculated for each of the peaks as the average of the five values obtained from the five calibration standards. For Aroclors 1221, 1232, 1242, 1248, 1254, 1262, and 1268 an RT is measured for a minimum of three peaks for a single-point calibration standard. If a valid fivepoint calibration is present for a specific Aroclor then an RT is measured for a minimum of three peaks in each of the five calibration standards and the RT is calculated as the average of the five values for each of the peaks obtained from the five calibration standards. An RT is measured for the surrogates in each of the five calibration standards of Aroclor 1016/1260, or from Aroclor 1016 if analyzed as a separate mixture. The surrogate RT is calculated as the average of

the five values. Calculate the RT using Equation 1:"

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HRS Reference #85

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 8 Exhibit D – Aroclor: Section 9.2.4.4	The following Section:  "The linearity of the instrument is determined by calculating a Percent Relative Standard Deviation (%RSD) of the Calibration Factors (CFs). Either peak area or peak height may be used to calculate CFs used in the %RSD equation.
	Five sets of CFs will be generated for the Aroclor 1016/1260 mixture, each set consisting of the CFs for each of the five peaks chosen for this mixture. The single standard for each of the other Aroclors will generate at least three CFs, one for each selected peak, unless a valid five-point calibration is present for a specific Aroclor, in which case five sets of CFs will be generated for the specific Aroclor.
	Calculate CFs, the Mean CF (CF), and the %RSD of the CFs for each peak in a selected set of a minimum of 3 major peaks for each Aroclor using Equations 2, 3, and 4."
	Is updated to: "The linearity of the instrument is determined by calculating a Percent Relative Standard Deviation (%RSD) of the Calibration Factors (CFs). Either peak area or peak height may be used to calculate CFs used in the %RSD equation.
	Five sets of CFs will be generated for the Aroclor 1016/1260 mixture, each set consisting of the CFs for each of the peaks (minimum of three) chosen for this mixture. The single standard for each of the other Aroclors will generate at least three CFs, one for each selected peak, unless a valid five-point calibration is present for a specific Aroclor, in which case five sets of CFs will be generated for the specific Aroclor. Calibration Factors (CF) for the surrogates must be generated for each of the five calibration standards of Aroclor 1016/1260, or from Aroclor 1016 if analyzed as a separate mixture.
	The $\overline{\text{CF}}$ of each surrogate compound is calculated as the average of the five values.
,	Calculate CFs, the Mean CF (CF), and the %RSD of the CFs for each peak in a selected set of a minimum of 3 major peaks for each Aroclor using Equations 2, 3, and 4."

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 9	The following Section:
Exhibit D – Aroclor: Section 9.3.1	"Summary of Continuing Calibration Verification (CCV)
	The analyses of instrument blanks and the required Aroclor CS3 Standard Mixtures (see Section 9.3.2) constitute the calibration verification. Sample (including LCS and MS/MSD) and required blank (method/sulfur cleanup) data are not acceptable unless bracketed by acceptable analyses of instrument blanks and the Aroclor CS3 Standard Mixtures: In cases where a valid five-point initial calibration for the detected Aroclors is required, that initial calibration may be substituted for the opening CCV."
	Is updated to:
	"Summary of Continuing Calibration Verification (CCV)
	The analyses of instrument blanks and the required Aroclor CS3 Standard Mixtures (see Section 9.3.2) constitute the calibration verification. Sample (including LCS and MS/MSD) and required blank (method/sulfur cleanup) data are not acceptable unless bracketed by acceptable analyses of instrument blanks and the Aroclor CS3 Standard Mixtures."
	Note the last sentence in the section is deleted:
	"In cases where a valid five-point initial calibration for the detected Aroclors is required, that initial calibration may be substituted for the opening CCV."

### **MODIFICATION (S)** EXHIBIT/SECTION(S) Aro-Item 10 The following section: Exhibit D - Aroclor: Section 9.3.2.1 An instrument blank and Aroclor 1016/1260 CS3 Standard Mixture must bracket one end of a 12-hour period (opening CCV) during which sample and required blank data are collected, and a second instrument blank and the Aroclor 1016/1260 CS3 Standard Mixture must bracket the other end of the 12-hour period (closing CCV). If during any 12hour period, an Aroclor other than 1016 or 1260 is detected and the 12hour time period for the five-point initial calibration of the detected Aroclor(s) has elapsed, then an instrument blank and a CS3 standard of the detected Aroclor(s) must bracket both ends of the 12-hour period. If the opening CCV does not meet all technical acceptance criteria, then a new valid five-point initial calibration for the detected Aroclors must be performed before samples containing the detected Aroclors may be analyzed. is updated to: "An instrument blank and Aroclor 1016/1260 CS3 Standard Mixture must bracket one end of a 12-hour period (opening CCV) during which sample and required blank data are collected, a second instrument blank, Aroclor 1016/1260 CS3 and CS3 Standard Mixture (s) of any other detected Aroclor (s) must bracket the other end of a 12hour period (closing CCV). Each opening CCV must include an instrument blank and Aroclor 1016/1260 CS3 standard, additional Aroclor CS3 standards may be performed at the laboratory's discretion. If a valid five-point calibration is available for Aroclor (s) other than 1016/1260, an opening CCV with an instrument blank and Aroclor 1016/1260 CS3 is sufficient, however, the closing CCV must include all Aroclors detected and meet opening CCV technical acceptance criteria in Section 9.3.5.3.

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 11 Exhibit D – Aroclor: Section 9.3.2.2	For the 12-hour period immediately following the initial calibration sequence, the instrument blank is the last step in the initial calibration sequence and brackets the front end of that 12-hour period. The injection of the instrument blank starts the beginning of the 12-hour period (Section 10.3.2.1.1), followed by the injection of the Aroclor 1016/1260 CS3 Standard. Samples (including LCSs and MS/MSDs) and required blanks (method/sulfur cleanup) may be injected for 12 hours from the injection of the instrument blank. The first injections immediately after that 12-hour period must be an instrument blank and the Aroclor 1016/1260 CS3 Standard Mixture. The instrument blank must be analyzed first, before the standard.
	Is updated to:  "The injection of an instrument blank starts the beginning of the 12-hour period (Section 10.3.2.1.1), followed by the injection of Aroelor 1016/1260 CS3 Standard and any additional CS3 Standard Mixture(s) as determined by the laboratory. Samples (including LCSs and MS/MSDs) and required blanks (method/sulfur cleanup) may be injected for 12 hours from the injection of the instrument blank. The first injections immediately after the previous 12-hour period must be an instrument blank, Aroclor 1016/1260 CS3 Standard and CS3 Standard Mixture(s) of any other detected Aroclor. A closing CCV must bracket the end of a 12-hour sequence.

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EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 12	The following Section:
Exhibit D – Aroclor: Section 9.3.2.3	"The analyses of the instrument blank and CS3 Standard Mixture (closing CCV) immediately following one 12-hour period may be used to begin the subsequent 12-hour period as an opening CCV, provided that they meet the technical acceptance criteria in Section 9.3.5. In that instance, the subsequent 12-hour period must be bracketed by the acceptable analyses of an instrument blank and a CS3 Standard Mixture (closing CCV), in that order. Those two analyses may in turn be used to bracket the front end of yet another 12-hour period (opening CCV). This progression may continue every 12 hours until such time as any of the instrument blanks or the CS3 Standard Mixture fails to meet the technical acceptance criteria in Section 9.3.4, or an Aroclor has been detected in a sample for which the corresponding CS3 standard was not performed for the opening CCV. The 12-hour time period begins with the injection of the instrument blank."
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	is updated to:
	"The analyses of the instrument blank and CS3 Standard Mixture(s) (closing CCV) immediately following one 12-hour period may be used to begin the subsequent 12-hour period as an opening CCV, provided that they meet the technical acceptance criteria in Section 9.3.5. In that instance, the subsequent 12-hour period must be bracketed by the acceptable analyses of an instrument blank and a CS3 Standard Mixture(s) (closing CCV), in that order. Those two analyses may in turn be used to bracket the front end of yet another 12-hour period (opening CCV). This progression may continue every 12 hours until such time as any of the instrument blanks or the required CS3 Standard Mixture (s) fails to meet the technical acceptance criteria in Section 9.3.5.
Aro-Item 13	The following section is deleted:
Exhibit D – Aroclor: Section 9.3.2.4	"If more than 12 hours have elapsed since the injection of the instrument blank that bracketed a previous 12-hour period, an acceptable instrument blank and an Aroclor 1016/1260 CS3 standard must be analyzed in order to start a new sequence. This requirement applies even if no analyses were performed since that standard was injected."

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 14	The following Section:
Exhibit D - Aroclor: Section 9.3.2.5	"The requirements for running the instrument blanks and CS3 Aroclor 1016/1260 Standard Mixture are waived when no samples (including LCSs and MS/MSDs), dilutions, reanalyses, or required blanks (method/sulfur cleanup) are analyzed during that 12-hour period. To resume analysis, using the existing initial calibration, the Contractor must first analyze an instrument blank and CS3 Aroclor 1016/1260 Standard that meet the technical acceptance criteria."
	To son July 3 to .
	Is updated to:  "The requirements for running the instrument blanks and CS3 Aroclor 1016/1260 Standard Mixture are waived when no samples (including LCSs and MS/MSDs), dilutions, reanalyses, or required blanks (method/sulfur cleanup) are analyzed during that 12-hour period. To resume analysis, using the existing initial calibration, the Contractor must first analyze an opening CCV that consist of an instrument blank, Aroclor 1016/1260 CS3 Standard, and any additional CS3 Aroclor Standard (s) that meet the technical acceptance criteria. Note: Additional opening CCV CS3 Aroclor Standard (s) determined to be necessary are at the laboratory's discretion."
Aro-Item 15	The current "Section 9.3.2.5" is updated to "Section 9.3.2.4".
Exhibit D – Aroclor: Section 9.3.2.5	70 - C.11i C/
Aro-Item 16 Exhibit D – Aroclor: Section 9.3.2.6	The following Section:  "If the entire 12-hour period is not required for the analyses of all samples and blanks to be reported and all data collection is to be stopped, the sequence must be ended with the instrument blank/CS3 Aroclor Standard Mixture (s) (1016/1260 and all detected Aroclors) combination."
	is updated to:
	"If the entire 12-hour period is not required for the analyses of all samples and blanks to be reported and all data collection is to be stopped, the sequence must end with an appropriate closing CCV combination, that is, an instrument blank/CS3 Aroclor 1016/1260 and all detected Aroclor CS3 Standard Mixture(s)."
Aro-Item 17 Exhibit D - Aroclor: Section 9.3.2.6	The current "Section 9.3.2.6" is updated to "Section 9.3.2.5".
Aro-Item 18 Exhibit D – Aroclor: Section 9.3.2.7	The following Section: "No more than 14 hours may elapse from the injection beginning the opening CCV (instrument blank) and the injection ending the closing CCV (Aroclor Standard)."
	Is updated to: "No more than 14 hours may elapse from the injection beginning the opening CCV (instrument blank) and the injection ending the closing CCV (Aroclor Standard). If more than 12 hours elapse between the injections of the two instrument blanks (opening and closing CCV) that bracket a 12-hour period in which samples or required blanks are analyzed, then the time between the injection of the instrument blank (closing CCV) and the preceding sample may not exceed the length of one chromatographic run."

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Aro-Item 19	The current "Section 9.3.2.7" is updated to "Section 9.3.2.6".
Exhibit D - Aroclor: Section 9.3.2.7	
Aro-Item 20	The following Section:
Exhibit D – Aroclor: Section 9.3.4	"Calculations for Calibration Verification
	For each analysis of the CS3 Individual Standard Mixture(s) used to demonstrate calibration verification, calculate the Percent Difference between the CF of each Aroclor peak (including the surrogates) in the standard mixture and the CF from the initial calibration, using Equation 5."
	is updated to:
	"Calculations for Calibration Verification
	For each analysis of the CS3 Individual Standard Mixture(s) used to demonstrate calibration verification, calculate the Percent Difference between the CF of each Aroclor peak in the standard mixture and the CF from the initial calibration, using Equation 5. Calculate the Percent Difference between CF of surrogates in each standard mixture and the CF from the initial calibration of Aroclor 1016/1260 or 1016 if analyzed as a separate mixture, using Equation 5."

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 21	The following Section:
Exhibit D - Aroclor: Section 9.3.5.3	"For the opening CCV, Percent Difference for each Aroclor peak and surrogates calculated from the CCV standard must not exceed ±15%. For the closing CCV, Percent Difference for each Aroclor peak and surrogates calculated from the CCV must not exceed ±50%. If the Percent Difference for the closing CCV is ±15% or less, then it can be used for the opening CCV of the next 12-hour period."
	is updated to:
·	"For the opening CCV, Percent Difference for each Aroclor peak and surrogates calculated from the CCV standard must not exceed ±15%. For the closing CCV, Percent Difference for each Aroclor peak and surrogates calculated from the CCV must not exceed ±50%. If the Percent Difference for the closing CCV is ±15% or less, then it can be used for the opening CCV of the next 12-hour period.
	Note: When a required closing CCV of an Aroclor other than Aroclor 1016/1260 is preceded by an opening CCV of Aroclor 1016/1260 CS3 only, the percent difference of each Aroclor peak and surrogate compound must not exceed ± 15%."
Aro-Item 22	The following Section:
Exhibit D — Aroclor: Section 9.3.6.7	"If a successful instrument blank and Aroclor 1016/1260 standard cannot be run after an interruption in analysis (Section 9.3.2.6), an acceptable initial calibration must be run before sample data may be collected. All acceptable sample (including LCS and MS/MSDs) and required blank (method/sulfur cleanup) analyses must be preceded and followed by acceptable standards and instrument blanks, as described in Section 9.3.2."
	is updated to:
	"If a successful instrument blank and Aroclor 1016/1260 standard cannot be run after an interruption in analysis (Section 9.3.2.6), an acceptable initial calibration must be run before sample data may be collected. All acceptable sample (including LCS and MS/MSDs) and required blank (method/sulfur cleanup) analyses must be preceded and followed by acceptable instrument blanks and standards (opening and closing CCV) as described in Section 9.3.2."
Aro-Item 23	The following Section:
Exhibit D - Aroclor: Section 10.2.2.3.1	"Using a syringe or a volumetric pipet, transfer all of the hexane extract to a 10mL vial and, in a fume hood, carefully add 5mL of the 1:1 (v/v) sulfuric acid/water solution."  is updated to:
· .	"Using a syringe or a volumetric pipet, transfer an aliquot (1 or 2 mL) of the hexane extract to a 10mL vial and, in a fume hood, carefully add 5mL of the 1:1 (v/v) sulfuric acid/water solution."
Aro-Item 24	The following Sections will be switched:
Exhibit D — Aroclor: Section 10.2.2.3.1 and 10.2.2.3.2	The language for the updated sentence of Section 10.2.2.3.1 will become Section 10.2.2.3.2 and vice versa.

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EXHIBIT/SECTION(S)  Aro-Item 25 Exhibit D - Aroclor: Section 10.3.2.1  All acceptable samples must be analyzed within a valid analy sequence as given below:  Time Injection # Material Injected First 12 steps of the calibration 1-12 calibration Instrument blank Aroclor 1016/1260 14 Standard Sample 12 hr.  Last sample	he initial
Exhibit D – Aroclor: Section 10.3.2.1  "Analytical Sequence  All acceptable samples must be analyzed within a valid analy sequence as given below:  Time Injection # Material Injected First 12 steps of the calibration 1-12 calibration Instrument blank Aroclor 1016/1266 14 Standard Sample	he initial
sequence as given below:  Time Injection # Material Injected First 12 steps of th  1-12 calibration  0 hr. 13 Instrument blank Aroclor 1016/1260  14 Standard Sample	he initial
sequence as given below:  Time Injection # Material Injected First 12 steps of th  1-12 calibration  0 hr. 13 Instrument blank Aroclor 1016/1260  14 Standard Sample	he initial
First 12 steps of the step of	
1-12 calibration 0 hr. 13 Instrument blank Aroclor 1016/1260 14 Standard Sample	
14 Standard Sample	50
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1 <sup>st</sup> injection past 12 hr. Instrument blank Aroclor 1016/126	
2 <sup>nd</sup> injection past 12 hr. standard Subsequent sampl Another 12 hrs. Last sample	ies
1st injection past 12 hr. Instrument blank Aroclor 1016/126	,
2 <sup>nd</sup> injection past 12 hr. standard	~
3 <sup>rd</sup> injection past 12 hr. Sample is updated to:	٠. ا
"Analytical Sequence  All acceptable samples must be analyzed within a valid analysequence as given below:	lysis
Time Injection # Material Injected First 12 steps of the	
1-12 (or 5-points of all calibration (or 5-p Aroclors) Aroclors)	points of all
0 hr. 13 Instrument blank 14 Aroclor 1016/126	60 Standard
15 Additional Arocl Standard (option	nal)
16 Subsequent Sam 12 hr. Last sample 1 injection past 12 hr. Instrument blank	
2 <sup>nd</sup> injection past 12 hr. Aroclor 1016/126 Detected Aroclor	60 Standard
3 <sup>rd</sup> injection past 12 hr. Standard (as req Detected Aroclo	quired)
14 hr. 4th injection past 12 hr. Standard (as req Subsequent Samp	
Another 12	
hrs. Last sample  1st injection past 12 hr. Instrument blank	c
2 <sup>nd</sup> injection past 12 hr. Aroclor 1016/126	
3 <sup>rd</sup> injection past 12 hr. Sample	

#### Aro-Item 26

Exhibit D - Aroclor: Section 10.3.2.1.1

#### MODIFICATION (S)

#### The following Section:

"The first 12 hours are counted from injection #13, not from injection #1. Samples may be injected until 12:00 hours have elapsed. All subsequent 12-hour periods are timed from the injection of the instrument blank that brackets the front end of the samples. If more than 12 hours elapse between the injections of two instrument blanks that bracket a 12-hour period in which samples or required blanks are analyzed, then the time between the injection of the instrument blank and the preceding sample may not exceed the length of one chromatographic run. While the 12-hour period may not be exceeded, the laboratory may run instrument blanks and standards more frequently, for instance, to accommodate staff working on 8-hour shifts. No more than 14 hours may elapse from the injection beginning the opening CCV (instrument blank) and the injection ending the closing CCV (Aroclor Standard)."

## is updated to:

"Injections #1 through #12 in Section 10.3.2.1 may be expanded to include all injections of initial calibration standards as specified in Option 2 and 3 in Section 9.2.3.5. The first 12 hours are counted from injection #13, not from injection #1, in the initial calibration sequence Option 1 detailed in Section 10.3.2.1. Alternately, the first 12 hours will be counted from the injection of the instrument blank of an opening CCV when performed immediately after completion of the initial calibration Options 2 and 3. Samples may be injected until 12:00 hours have elapsed. All subsequent 12-hour periods are timed from the injection of the instrument blank that brackets the front end of the samples. If more than 12 hours elapse between the injections of two instrument blanks that bracket a 12-hour period in which samples or required blanks are analyzed, then the time between the injection of the instrument blank and the preceding sample may not exceed the length of one chromatographic run. While the 12hour period may not be exceeded, the laboratory may run instrument blanks and standards more frequently, for instance, to accommodate staff working on 8-hour shifts. No more than 14 hours may elapse from the injection beginning the opening CCV (instrument blank) and the injection ending the closing CCV (Aroclor Standard)."

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EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 27	The following:
Exhibit D - Aroclor: Section 10.3.3.2	"If the response of the largest peak for any Aroclor is greater than the response of the same peak in the high-point standard in the initial calibration for both columns, then the sample must be diluted to have the response of the largest peak of the lower of the two column analyses be between the low and high calibration standards."
	Is updated to:
	"If the concentration of the largest peak for any Aroclor is greater than the concentration of the same peak in the high-point standard in the initial calibration for both columns (the largest peak on the second column may be a different peak), then the sample must be diluted to have the concentration of the largest peak of the lower of the two column analyses be between the low and high calibration standards."
Aro-Item 28 Exhibit D – Aroclor: Section 10.3.3.8	The following: "Use the results of the original analysis to determine the approximate
Exhibit D — Arocior: Section 10.3.3.8	DF required to get the largest analyte peak (for the lower of the two column responses) within the initial calibration range."
	Is updated to:
	"Use the results of the original analysis to determine the approximate DF required to get the largest analyte peak (for the lower of the two column concentrations) within the initial calibration range."
Aro-Item 29	The following Section:
Exhibit D - Aroclor: Section 11.1.1.4	"When an Aroclor other than 1016 or 1260 is detected in a sample, a valid five-point calibration curve specific to that Aroclor must be run, followed by reanalysis of the sample or appropriately diluted sample with the detected Aroclor present. The Mean Calibration Factor (CF) will be used to quantitate the analyte in the sample."
	is updated to:
	"When an Aroclor other than 1016 or 1260 is detected in a sample, using a single point calibration, a valid five point calibration of the specific Aroclor must be performed, followed by reanalysis of the sample or appropriately diluted sample (if the sample concentration of Aroclor exceeded calibration) with the Aroclor detected initially. If a valid five-point calibration curve is available for an Aroclor other than 1016 or 1260, the Mean Calibration Factor $(\overline{CF})$ will be used for quantitation of the Aroclor in the sample, however, quantitation of the surrogate compounds using surrogate data from
	the initial five-point Aroclor 1016/1260 or from Aroclor 1016 if analyzed as a separate mixture.
	Note: An estimated concentration (reported with an "S" flag) of the initial detection for an Aroclor other than 1016 or 1260, using a single point calibration standard will be quantitated using the Calibration Factor (CF), of at least 3 major peaks, from the specific single point calibration standard. The surrogates will be quantitated using the initial five-point Aroclor 1016/1260 or from Aroclor 1016 if analyzed as a separate mixture.

3.

#### **MODIFICATION (S)**

Aro-Item 30

Exhibit D - Aroclor: Section 11.2.1.1.1, Equation 7

The equation is further expanded to allow for greater flexibility in the preparation and cleanup steps as follows:

$$Concentration \ \mu\text{g/L} = \left(\frac{A_x}{\overline{CF}}\right) \left(\frac{DF}{V_i}\right) \left(\frac{V_i}{V_o}\right) \left(\frac{CV_{\text{out}}}{CV_{\text{in}} \times E}\right)_l \left(\frac{CV_{\text{out}}}{CV_{\text{in}} \times E}\right)_2 \cdots \left(\frac{CV_{\text{out}}}{CV_{\text{in}} \times E}\right)_n$$

where,

A<sub>x</sub> = Peak area or peak height of the compound to be measured.

CF = Mean Calibration Factor determined from the initial calibration for the compound to be measured, in area/ng.

DF = Dilution Factor.

V<sub>i</sub> = Volume of extract injected in μL.

V<sub>t</sub> = Volume of extract produced by the preparation process (extraction and concentration), and before cleanup, in uL.

V<sub>o</sub> = Volume of the original water sample extracted in mL. Note: for instrument blanks and sulfur blanks assume a volume of 1000mL.

CV<sub>out</sub> = Volume of extract produced by a cleanup process (cleanup and concentration), in µL.

 $CV_{in}$  = Volume of extract subjected to a cleanup process, in  $\mu L$ .

E = The efficiency of the cleanup process expressed as a fraction of material that passes through or is not mechanically lost during the cleanup step (e.g. 50% efficiency must be expressed as 0.50)

#### Aro-Item 31

Exhibit D - Aroclor: Section 11.2.1.2.1, Equation 9

The equation is further expanded to allow for greater flexibility in the preparation and cleanup steps as follows:

Concentration 
$$\mu g/kg = \left(\frac{A_x}{\overline{CF}}\right) \left(\frac{DF}{V_i}\right) \left(\frac{V_t}{W_t \times D}\right) \left(\frac{CV_{out}}{CV_{in} \times E}\right)_1 \left(\frac{CV_{out}}{CV_{in} \times E}\right)_2 \dots \left(\frac{CV_{out}}{CV_{in} \times E}\right)_n$$

where

 $A_{so}$   $\overline{\text{CF}}$ , DF,  $V_i$ ,  $V_b$ ,  $CV_{oab}$ ,  $CV_{in}$ , and E are the same as Equation 7 above.

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 $W_t$  = Weight of the original soil sample extracted in g.

$$D = \frac{100 - \% \text{Moisture}}{100}$$

MODIFICATION (S)
The following Section:
"Target Compounds
The quantitation of Aroclors must be accomplished by comparing the heights or the areas of each of a minimum of 3 major peaks of the Aroclor in the sample with the CF for the same peaks established during the specific five-point calibration. The concentration of multi-component analytes is calculated by using Equations 7 and 9, where $A_x$ is the area for each of the major peaks of the Aroclor. The concentration of each peak is determined and then a mean concentration for a minimum of 3 major peaks is determined on each column."
is updated to: "Target Compounds
Except for an estimated value reported for an Aroclor other than 1016 or 1260, The quantitation of Aroclors must be accomplished by comparing the heights or the areas of each of a minimum of 3 major peaks of the Aroclor in the sample with the CF for the same peaks established during the specific five-point calibration. The concentration of multi-component analytes is calculated by using Equations 7 and 9, where $A_x$ is the area for each of the major peaks of the Aroclor. The concentration of each peak is determined and then a mean concentration for a minimum of 3 major peaks is determined on each column."
The following Section:
"Note that the CFs used for the quantitation of Aroclors are the CFs from the concentration of the specific five-point calibration."
is updated to:
"To quantitate and report the estimated concentration of an Aroclor other than 1016 or 1260, use the Calibration Factor (CF) for a minimum of 3 major peaks, from the single point Aroclor calibration standard used for the Aroclor pattern recognition. It will be necessary to substitute the single Calibration Factor (CF) for the Mean CF ( $\overline{CF}$ ) in Equations 7, 8, 9 and 10.  Note: The CFs used for the quantitation of target Aroclors are the CFs from the concentration of the specific five-point calibration."

MODIFICATION (S)

Aro-Item 34

Exhibit D - Aroclor: Section 11.2.3.1, Equation 12

The equation is further expanded to allow for greater flexibility in the preparation and cleanup steps as follows:

EQ. 12 Adjusted CRQL Calculation for Water Samples

Adjusted CRQL = (Contract CRQL) 
$$\left(\frac{V_x}{V_o}\right) \left(\frac{V_t}{V_y}\right) \left(DF\right) \left(\frac{CV_{out}}{CV_{in} \times E}\right) \left(\frac{CV_{out}}{CV_{in} \times E}\right) \cdots \left(\frac{CV_{out}}{CV_{in} \times E}\right)$$

where,

Contract CRQL = The CRQL value reported in Exhibit C - Aroclors (µg/L).

 $V_x$  = Contract sample volume (1000 mL).

V<sub>0</sub> = Volume of water extracted in mL. Note: for instrument and sulfur blanks assume a volume of 1000mL.

V<sub>t</sub> = Volume of water concentrated extract in μL.

 $V_v$  = Contract concentrated extract volume (10,000  $\mu$ L).

DF = Dilution Factor.

CV<sub>out</sub> = Volume of extract produced by a cleanup process (cleanup and concentration), in μL.

CV<sub>in</sub> = Volume of extract subjected to a cleanup process, in μL.

E = The efficiency of the cleanup process expressed as a fraction of material that passes through or is not mechanically lost during the cleanup step (e.g. 50% efficiency must be expressed as 0.50).

#### MODIFICATION (S)

Aro-Item 35

Exhibit D - Aroclor: Section 11.2.3.2 Equation 13

The equation is further expanded to allow for greater flexibility in the preparation and cleanup steps as follows:

# EQ. 13 Adjusted CRQL Calculation for Soil/Sediment Samples

$$\text{Adjusted CRQL} = \left( \text{Contract CRQL} \right) \left( \frac{W_x}{W_s \times D} \right) \left( \frac{V_t}{V_y} \right) \left( DF \right) \left( \frac{CV_{\text{out}}}{CV_{\text{in}} \times E} \right)_t \left( \frac{CV_{\text{out}}}{CV_{\text{in}} \times E} \right)_2 \cdots \left( \frac{CV_{\text{out}}}{CV_{\text{in}} \times E} \right)_n$$

where,

Contract CRQL = The CRQL value reported in Exhibit C - Aroclors (µg/Kg).

 $W_x$  = Contract sample weight (30 g).

W<sub>1</sub> = Weight of sample extracted in grams (g).

 $\mathbf{p} = \frac{100 - \%\text{Moisture}}{100}$ 

 $V_{r}$  = Volume of the concentrated extract in  $\mu L$ .

 $V_v$  = Contract concentrated extract volume (10,000  $\mu$ L).

DF = Dilution Factor.

CV<sub>out</sub> = Volume of extract produced by a cleanup process (cleanup and concentration), in μL.

 $CV_{in}$  = Volume of extract subjected to a cleanup process, in  $\mu L$ .

E = The efficiency of the cleanup process expressed as a fraction of material that passes through or is not mechanically lost during the cleanup step (e.g. 50% efficiency must be expressed as 0.50).

#### Aro-Item 36

Exhibit D - Aroclor: Section

11.2.4

The following Section:

"The concentrations for surrogate compounds can be calculated by using Equation 7 (for waters) and Equation 9 (for soils) and the CF from the most recent initial calibration."

is updated to:

"The concentrations for surrogate compounds can be calculated by using Equation 7 (for waters) and Equation 9 (for soils) and the CF from a valid initial five-point calibration of Aroclor 1016/1260 or from Aroclor 1016 if analyzed as a separate mixture."

EXHIBIT/SECTION(S)	MODIFICATION (S)
Aro-Item 37 Exhibit D – Aroclor: Section 11.3.5	The following Section:  "The RT for each of the surrogates must be within the RT window (Section 9.2.4.3) for both GC columns."
	is updated to:  "Surrogate compounds Retention Time (RT) must be compared to the window established during a valid initial five-point calibration of Aroclor 1016/1260 or from Aroclor 1016 if analyzed as a separate mixture. The RT for each of the surrogates must be within the RT window (Section 9.2.4.3) for both GC columns."
Aro-Item 38 Exhibit D - Aroclor: Section 12.3.4.2	The following Section: "Calculate individual compound recoveries of the LCS using Equation 14" is updated to: "Calculate individual compound recoveries of the LCS using Equation 15".